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ABSTRACT

This report presents survey data, as of early 1990, on administration of the Hawkins-Stafford Amendments of the Elementary and Secondary School Act and on the continuing functions of state education agencies (SEAs), such as application review and monitoring. The Hawkins-Stafford amendments are designed to mandate accountability for student outcomes, create or strengthen mechanisms for involving local practitioners in state-level decisions, involve parents in the educational program, and require stronger coordination between Chapter 1 and other instruction. Results of surveys of 53 SEAs and site visits to 5 SEAs show that, while Chapter 1 services are perceived as necessary parts of the law, the amendments' provisions are being perceived as low priority items that involve a high level of burden in implementation; little change relative to the provisions is noted. The report provides background information relative to the development, goals, and methods of the study; what was found in terms of the early effects of the provisions for program improvement; how SEAs have handled other new provisions; and the SEAs' administrative responsibilities. Overall, the SEAs are taking a cautious stance in implementing the new provisions: most SEAs have not required a standard higher than zero normal curve equivalents identifying schools needing improvement; and most have been slow to disburse their grants for program improvement. Includes 37 tables. (GLR)

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State Administration of the Amended Chapter 1 Program

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STATE ADMINISTRATION OF THE AMENDED CHAPTER 1 PROGRAM

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EXECUTIVE SUMMARY

The Augustus F. Hawkins - Robert T. Stafford Elementary and Secondary School Improvement Amendments of 1988 made a number of important changes to Chapter 1, the federal program of compensatory education for children with low achievement living in high-poverty areas. The amendments mandated accountability for student outcomes, created or strengthened mechanisms for involving local practitioners in state-level decisions and involving parents in the educational program, and required stronger coordination between Chapter 1 and other instruction.

As these changes filter through the intergovernmental system that administers Chapter 1, state education agencies (SEAs) play a pivotal role: they do much to communicate the new emphases to their districts, and they in turn are in a good position to learn about early local implementation. Therefore, this study has used a survey of 53 SEAs (in the 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs) and site visits to five SEAs in order to learn about the early state-level response to the Hawkins-Stafford Amendments. This report presents information as of early 1990 on administration of the law's new provisions and on the SEAs' continuing functions such as application review and monitoring.

The overall message emerging from this study is that the Hawkins-Stafford Amendments are off to a slow start. The state and local officials who administer Chapter 1 have been following the standard operating procedures of a mature program for years. Anyone who expected the amendments to shake up the program significantly is likely to be disappointed with the state of affairs existing at the beginning of 1990, which could be characterized (with some exceptions) as "more of the same." The new mechanisms of accountability and program improvement have not stimulated particularly high standards for student achievement or an early surge of new ideas for school improvement. State coordinators find these mechanisms burdensome, and many also consider their programmatic contributions to be minor. As a group, the coordinators view the provisions for targeting Chapter 1 services as the most necessary parts of the law, while perceiving the new provisions for program improvement as relatively low in priority and high in burden. Committees of practitioners, given a charter to review state plans and rules, have been as reticent as SEAs, and in some states have advised lower standards. Schoolwide projects, intended to transform schools with highly disadvantaged enrollments, have been aimed instead at simply reducing class size. To be sure, any of these conclusions could change as SEAs and school districts gain more experience with the new amendments. The findings of this survey may reflect only initial caution on the part of the SEAs and districts. However, if these findings capture a pattern of limited change that persists over the next year or two, proponents of the Hawkins-Stafford innovations will be in for a serious disappointment.

The most innovative provisions of the Hawkins-Stafford Amendments are a set of requirements directing school districts and states to find out where the program is not working well and to improve its

operation. Specifically, districts were required to use 1988-89 data to identify schools where students were not making achievement gains or were not progressing toward other outcomes specified by the state or the district, and they were required to begin working to improve these schools during 1989-90. Districts must also identify students who are not making gains and then take steps as needed to adjust those students' programs. At a later stage of program improvement, the SEAs will be required to step in where local efforts have not resulted in better school performance.

This survey, conducted when SEAs were in the early stages of carrying out these new requirements, shows that they got off to a cautious start; keeping the process manageable has evidently (and understandably) been important to them. A sizable group of SEAs, for example, has done the identification of schools themselves rather than having the districts do it. The aspects of program improvement that have been most controversial in the largest number of states have been the setting of standards and the timetable for improvement. On both these issues, SEAs have moved more cautiously than federal policymakers may have expected or wished. For example, most SEAs and districts did not set a standard for aggregate student achievement any higher than the one specifically mentioned in regulations. This decision has had the effect of minimizing the number of schools identified. It has also sent an implicit message of low expectations for the effects of Chapter 1 on student achievement.

- o While in 31 states it is districts that do the initial identification of schools in need of improvement, a sizable minority of 22 SEAs either does the identification themselves or works with districts to identify schools.

- o The standard for aggregate student performance appearing in the Chapter 1 regulations--that schools must be identified if students show no gain or a decline as measured in normal curve equivalents (NCEs)--is the only achievement standard used in 27 states; it is used in at least some districts in another nine states. A higher NCE standard is in effect throughout 16 states.

- o SEAs are also using sustained effects (i.e., student achievement gains over a period longer than one year) as a measure in the identification process, and districts are using a wide variety of measures, including grades, attendance, retentions in grade, and dropout rates.

- o In states, schools may be exempted from program improvement due to local conditions (e.g., a change in testing instruments that makes results invalid, or indicators other than test scores that demonstrate positive program effects). Forty SEAs are making the exemption decisions themselves, while 11 are allowing districts to decide.

The identification process has had the following results so far:

- o SEAs reported the identification of 5,033 schools in 2,166 districts as in need of improvement. This represents about 10 percent of Chapter 1 schools and 15 percent of Chapter 1 districts.

Even if standards remain unchanged next year, it is reasonable to expect that a larger number of schools will be identified then. This first identification process relied on evaluation data from 1988-89, when districts were not required to measure achievement in more advanced skills and when fall pretests and spring posttests were much more widespread than in 1989-90. Both of these features of past evaluation

practice had the general effect of raising the apparent level of student gains. Thus, when new evaluation practices go into use this year, more schools will fall below a given standard of achievement.

The process of improving the Chapter 1 program in the identified schools is also getting under way somewhat slowly. As of January 1990, few SEAs had spent any of their grants for program improvement, and relatively few had fully decided how to spend these grants. The sources of assistance for districts have been familiar, conventional ones. The ideas brought to bear on school improvement may also be rather conventional and perhaps outdated.

- As of January 1990, eight SEAs had begun to spend their grants for program improvement. Of the funds controlled by the responding SEAs, 52 percent will be spent in ways that have not yet been determined.
- Among the identified schools, SEAs reported that 26 percent are fully implementing their improvement plans this year.
- SEA Chapter 1 offices reported that they themselves have assisted 78 percent of the districts with schools in need of improvement, and that Technical Assistance Centers or Rural Technical Assistance Centers have assisted 31 percent. Districts have used other sources of assistance much less often, as far as these respondents know.
- One component of the SEAs' help, in the states visited, has been the dissemination of self-assessment checklists for schools based on the effective-schools literature of the 1970s.

The Hawkins-Stafford Amendments introduced new requirements and procedures in several other areas as well. The amendments require each SEA to appoint a committee of practitioners to review both the state program improvement plan and rules, regulations, or policies relating to the administration or operation of Chapter 1 that districts must follow. Ironically, these committees may have turned out to represent, on the whole, an influence for caution in implementing the law's other requirements.

- Nationwide, 24 percent of committee members are local Chapter 1 coordinators (and another 12 percent are other local administrators, such as superintendents or curriculum supervisors); 17 percent are teachers; and 17 percent are parents.
- On average, committees had met three times through the end of 1989. Their primary role in developing both the program improvement plan and SEA rules or policies has been to comment on initial drafts; many committees have also helped decide on the final contents of the plan or the rules; and some committees have participated in drafting or in soliciting comments from others.
- Some SEA coordinators reported in interviews that the committees have actively discouraged them from setting high standards for schools in need of improvement. The committees' composition, which is weighted towards administrators with a stake in the program's current operating procedures, makes it plausible to guess that this type of advice from committees may have been widespread.

In parent involvement, the law has increased the emphasis on involving parents in the educational programs of their own children. Parents must also have information about the Chapter 1 program and opportunities to participate in decisionmaking. This study's findings show that SEAs have tried to convey a message about parent involvement, but they have very limited staff capacity in this area. The

form of parent involvement most actively promoted by SEAs and most widely practiced by districts is parent-teacher conferences. Beyond conferences, the SEAs have used their limited resources to promote a wide array of priorities.

- Parent involvement has been a high priority in onsite monitoring for 35 SEAs. Thirty-four SEAs rank it as a major area of need for technical assistance among districts.
- The SEAs' assistance providers in parent involvement include eight full-time equivalent staff members nationwide who are parent specialists, plus the "generalist" staff members who make up two-thirds of the SEA Chapter 1 offices and conduct most monitoring and assistance.
- The most common mode of assistance is the dissemination of materials about parent involvement developed by someone other than the SEA; 41 SEAs disseminate such materials.
- In their work with districts, most SEAs (46) strongly promote informing parents about their child's school performance. At least half of SEAs also strongly promote increasing parent involvement in Chapter 1 decisionmaking groups (29 SEAs), training parents to help their child with homework (27 SEAs), and training teachers about parents' role in their children's education (26 SEAs).
- To the best of the SEAs' knowledge, 70 percent of districts conduct Chapter 1 parent-teacher conferences. The number of districts conducting conferences has increased by 14 percent since 1988-89 in states where estimates are available for both years. A form of parent involvement that is growing rapidly is the dissemination of home-based education activities, which is taking place in 37 percent of districts, an increase of 60 percent.

The Hawkins-Stafford Amendments and the regulations require coordination between Chapter 1 and both the regular instructional program and other federal and state programs. In response, SEAs have increased the specificity of their requirements in this area.

- The number of SEAs requiring applications to contain a narrative description of coordination with the regular program has risen from 25 in 1988-89 to 35 in 1989-90; for coordination with other special programs the increase has been from 11 to 19 SEAs.
- Coordination with the regular program has been a high priority in monitoring for 23 SEAs and a part of monitoring (whether of high priority or not) for 51. Coordination with other special programs is a less prominent focus, reported as a high priority in monitoring by four SEAs and as a part of monitoring by 38.

The Hawkins-Stafford Amendments removed a matching-funds requirement for district participation in schoolwide projects. These projects, permissible in schools where 75 percent of the students come from low-income families, allow the use of Chapter 1 resources without special targeting to eligible students. The amendments also created a new type of special project, innovation projects, under which a district can use up to 5 percent of its basic grant for various activities in educational improvement or to continue services for previously eligible students. While schoolwide projects have increased in popularity, this study's findings suggest that neither option is having a widespread effect of stimulating new program designs.

- Schoolwide projects are on the increase, from 199 in 1988-89 to 621 in 1989-90. The number of states having schoolwide projects has risen from 22 to 40.

- As reported by SEA coordinators, some 79 percent of schoolwide projects include a reduction in class size. Projects with this feature outnumber even those incorporating effective schools programs, which constitute 62 percent of projects.

- Innovation projects have not become widespread this year; they are found in just 97 districts nationwide.

SEAs have continued to carry out their traditional responsibilities in rulemaking, application development and review, monitoring, and funds allocation. These functions are important in the overall picture of SEA program administration; coordinators reported that SEA Chapter 1 staff members across the board spend 23 percent of their time dealing with applications and 33 percent of their time doing monitoring. The study's findings in these areas are as follows:

- Relatively few SEAs have issued rules in any given program area since September 1988, since SEAs are more apt to call their guidance to districts "policies" rather than "rules." The leading areas for both rules and policies are the identification of schools in need of improvement and plans for working with schools in need of improvement.

- Communication between SEAs and districts is frequent during the application process. Most districts (55 percent) contact their SEA with questions, and SEAs in turn contact most districts (61 percent) to resolve problems found in applications. In general, these problems are relatively minor (e.g., arithmetic errors).

- Areas in which problems most frequently arise in applications include the budget (a frequent problem area for 47 SEAs), program design (30 SEAs), student selection (28 SEAs), attendance area selection (27 SEAs), and parent involvement (22 SEAs).

- Although the frequency and intensity of onsite monitoring vary a great deal from state to state, SEAs most often report that monitors visit districts of at least 10,000 enrollment annually. Smaller districts are most likely to have visits every three years. Some SEAs monitor some districts on a two-year cycle or a cycle of four or more years, but these cycles are generally less common.

- Areas that are high monitoring priorities for a majority of SEAs are student selection (41 SEAs), parent involvement (35 SEAs), and supplement not supplant (31 SEAs). SEAs typically try to be comprehensive in their monitoring, however, and to examine a great many facets of the Chapter 1 program.

- Nationwide, 5,874 districts receive concentration grants, which are provided to districts with high concentrations or large numbers of students from low-income families. Of the districts that receive the grants, 269 are eligible districts located in otherwise ineligible counties (under a funds-allocation procedure spelled out in the amendments). Just two SEAs ask districts to account separately for their use of concentration grants.

- SEAs estimate that 9 percent of all Chapter 1 districts would carry over more than 25 percent of their grant funds if the amendments did not prohibit this.

Finally, the survey asked SEA coordinators to rate 11 categories of Chapter 1 requirements according to their degree of necessity and the amount of burden they create.

- The categories of requirements that coordinators rated first, second, and third in necessity are ranking and selecting students, needs-assessment procedures, and ranking and selecting project areas. The new provisions for program improvement were rated eighth in necessity, on average.

- The coordinators, on average, rated the new provisions for program improvement as the most burdensome category of requirements. The categories rated second and third are evaluation procedures and needs-assessment procedures.

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I. Background: Studying the State Role in Chapter 1

Chapter 1 of Title I of the Elementary and Secondary Education Act has a 25-year history of providing grants for supplementary educational services to low-achieving students in high-poverty areas. A mature program, Chapter 1 has well-established administrative procedures at the federal, state, and local levels. However, the most recent amendments to Chapter 1, the Augustus F. Hawkins - Robert T. Stafford Elementary and Secondary School Improvement Amendments, introduced new procedures, responsibilities, and emphases into program administration and accountability. This report presents the findings of a study of the amendments' first year of implementation at the state level.

Legislative Background for This Study

The Hawkins-Stafford Amendments break new ground in several important respects. They alter the basis for accountability in federal grant programs by holding school districts and state education agencies (SEAs) responsible for students' educational progress. They also enlarge the role of parents in program services and the role of local practitioners and laypeople in developing program requirements. Specifically, among the federal statutory requirements that open the door to new procedures are the following:

- When participating students in a school do not meet a threshold level of performance on the skills tested, including more advanced skills, that school is identified as in need of improvement and must carry out a plan for improvement.
- The SEA must become involved in the improvement of any school that persists in showing low performance levels.
- Schools that have at least a 75 percent poverty level may use Chapter 1 funds for schoolwide projects, without special targeting of students within the school, and without providing the local matching funds that were previously required from districts using this option.
- A committee of practitioners, including staff members from local districts and schools, board members, and parents, must review all major state rules.
- Parent participation in the educational program receives new emphasis throughout the law.

Despite the changes they introduced, the Hawkins-Stafford Amendments did not alter the most basic purposes or requirements of Chapter 1. The following requirements form a stable foundation for state and local program administration:

- A school district receives funds only after its SEA has approved a local program application.
- SEAs are responsible for ensuring that districts comply with all provisions of the law and regulations.
- With few exceptions, programs must be targeted to schools whose attendance areas have relatively high levels of poverty and, within those schools, to the low-achieving students in greatest need of assistance.
- Several fiscal requirements are designed to ensure that Chapter 1 resources provide something extra to participating schools and students rather than substituting for other state and local resources.
- Districts must evaluate participating students' progress annually and use the results in program planning.
- Parents of Chapter 1 children must have opportunities for involvement in the program.

The SEA Chapter 1 offices, then, occupy an important position in program administration. Their continuing authority in application development, application review, and program oversight makes them the primary source of information about the law for many local coordinators. While some SEAs' authority may have diminished due to the involvement of the committee of practitioners or new statutory restrictions in a few areas such as the carryover of funds, they remain on balance a major actor in the Chapter 1 program. Indeed, the new provisions of the Hawkins-Stafford Amendments assign them a key role in the effort to improve program performance.

The new law's enactment in April 1988 was the first step in the implementation timetable. Although states had the option of implementing the new provisions in the 1988-89 school year, most of the provisions did not become mandatory until 1989-90, when the U.S. Department of Education (ED) had issued final regulations giving more specificity to the law's operational requirements. (However, data from 1988-89 had to be used in identifying schools in need of improvement.)

Goals and Methods of This Study

This study focuses on the state level because of the SEAs' key role in communicating and enforcing the law's requirements for local school districts, and because their actions during 1989 laid important groundwork for the local implementation of the Hawkins-Stafford Amendments. We requested data from all the SEAs concerning the procedures they have established for carrying out specific provisions of the law. We also asked for their early assessments of how local education agencies (LEAs) are responding to the law's requirements. The study deals only with the administration of the Chapter 1 basic grants that go to LEAs, the state set-asides for program administration, and the state grants for program improvement. It does not deal with the components of Chapter 1 under which SEAs deliver services to migrant students, handicapped students, and neglected or delinquent students.

Data collection for this study took place midway through the first school year of mandatory compliance with the Hawkins-Stafford Amendments. The primary means of data collection was a survey mailed in January 1990 to Chapter 1 coordinators in the 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs. All 53 coordinators responded, although not every coordinator provided an answer to every question. Earlier in the school year, members of the study team visited five SEA Chapter 1 offices in states that vary in size and region. From November 1989 through January 1990, the Subcommittee on Elementary, Secondary, and Vocational Education of the House Committee on Education and Labor conducted its own survey of 51 SEA coordinators (including the District of Columbia but not Puerto Rico or the Bureau of Indian Affairs), covering some of the same topics as this survey. Where the two surveys overlap, the differences in findings are minor and can probably be attributed to differences in the number of respondents or the exact timing of responses. This report will discuss these differences and suggest possible explanations for them.

Four years before this survey, the SEA Chapter 1 coordinators responded to a telephone survey carried out for ED's National Assessment of Chapter 1. Although much of that survey was tailored to a particular set of issues prominent in the early 1980s (revolving around the transition to Chapter 1 from its predecessor program, Title I), we replicated some of its more general questions in order to obtain data on trends.

Summary

SEAs occupy a pivotal role in Chapter 1 program administration. They typically take the lead in communicating program requirements and priorities to local school districts, through formal means such as state rulemaking and more informal means such as the emphases they convey in application review. Thus, their early response to the Hawkins-Stafford Amendments is setting a framework for the local implementation of the new law. They will help shape the effects of its innovative provisions in program accountability, the involvement of parents and the public, schoolwide and innovation projects, and coordination with the regular instructional program. The SEAs' methods of affecting the program remain, for the most part, the hardy perennials of application review, monitoring, and rulemaking.

This report deals with the law's new and continuing provisions as they apply to SEAs and as SEAs perceive their early effects on school districts. It is based on a survey of all SEAs and visits to five diverse SEAs.

II. Early Effects of the Provisions for Program Improvement

The most innovative feature of the Hawkins-Stafford Amendments is their mandated procedures for program improvement. Every SEA must develop a "program improvement plan," with procedures for the identification and improvement of "schools in need of improvement." These schools are the ones where Chapter 1 students' achievement gains fall short of either a nationwide minimum standard (namely, some improvement in achievement in both basic and more advanced skills) or a higher aggregate standard set by the SEA, or where other outcomes fall short of desired outcomes set by the SEA or the district. Once the schools have been identified, the district must carry out a plan for improving them. If a school continues to show a need for improvement, the SEA must become a participant in the improvement process.

Schools in need of improvement had to be identified for the first time on the basis of data from 1988-89. Districts had to develop and begin implementing their improvement plans as soon as possible, although they were not required to put all components of an improvement plan into place during 1989-90. SEAs received funds in 1989-90 for the improvement of these schools, but use of these funds did not have to begin by the time of our survey (January 1990).

In addition to these procedures for school improvement, the law mandates that districts identify individual students who are not making adequate gains in the Chapter 1 program. Districts must annually assess and meet the needs of such students.

This chapter discusses, first, the identification of schools in need of improvement. The second part of the chapter discusses the early implementation of plans for improving these schools, and the third part analyzes the administrative procedures SEAs are using with respect to all of the law's new improvement provisions. The survey findings provide early answers to several questions associated with the new provisions, such as the following:

- What standards are states and districts setting for schools in need of improvement? How much diversity exists in the standards? How rigorous are they?
- How are states carrying out the provision that allows schools to be exempted from program improvement due to local conditions?
- How many schools have been identified as in need of program improvement? In how many districts?
- Who is providing help to the schools identified for program improvement?
- How are the SEAs spending their grants for program improvement?
- How rapidly has program improvement gotten under way?

Criteria and Division of Responsibility

The law and regulations concerning the identification of schools in need of improvement allow for considerable variation in who does the identification and what criteria they use. The Hawkins-Stafford Amendments have created a three-tiered system of criteria for identifying schools in need of improvement. The first tier comprises ED's final regulations, which mandate the identification of any school in which Chapter 1 participants, in the aggregate, have no gains or a loss in normal curve equivalents (NCEs) on standardized achievement tests. Second, SEAs have the authority to set their own aggregate performance standards, which can be higher than the zero-NCE standard or can use other measures. Third, school districts are told to specify in their applications the "desired outcomes" for their Chapter 1 projects, and they are to identify as in need of improvement any school where students are not making "substantial progress" toward these outcomes.

The identification of schools in need of improvement can also be a two-step process, since the law and regulations allow local conditions to be taken into consideration in making the identification. Thus, a school that has been tentatively identified could be exempted from the mandatory program improvement process for one of several authorized reasons (e.g., a change in testing instruments that makes results invalid, or indicators other than test scores that demonstrate positive program effects). Local conditions are also to be considered in other parts of the improvement process, such as designing improvement plans.

Centralized vs. Decentralized Identification

Not surprisingly, given the complexity of the prescribed procedures for identifying schools in need of improvement, their implementation varies from state to state. The most basic type of variation is in the division of responsibility for identifying schools. As Table II-1 shows (looking first at the total figures in the bottom row and the right-hand column), districts most often do the initial identification of schools that may be in need of improvement (having this responsibility in 31 states, while in 17 states the SEA does the initial identification, and in five states the responsibility is joint); SEAs most often decide whether to exempt any schools from the improvement process due to local conditions (in 40 states, as opposed to 11 where the districts do so). Each possible combination of procedures is found in at least some states, as the middle part of the table shows. The most common pattern, found in 24 states, is that local school districts are responsible for initially identifying schools that may be in need of improvement, and then the SEA decides whether to exempt any of these schools from the improvement process due to local conditions. Next most common is a completely centralized process, in which the SEA does the initial data analysis to identify schools and goes on to make any exemption decisions; this is the procedure in 13 states.

Table II-1

Procedures for Identifying
Schools in Need of Improvement
(n=53)

Number of States

Agency That Determines Exemptions	Agency That Does Initial Identification			Total
	LEAs	SEA	LEAs and SEA jointly*	
SEA	24	13	3	40
LEAs	7	4	0	11
Not specified	0	0	2	2
Total	31	17	5	53

* SEAs reporting this procedure did so in an "Other" category.

Table reads: In 24 states, the LEAs identify a preliminary set of schools that may be in need of improvement, and the SEA decides whether local conditions will lead to exemptions for some of these schools; in 13 states, the SEA both does the initial identification and determines exemptions.

Our site visits suggest how these procedural differences can reflect different philosophies of school improvement. Some of the coordinators in the five states visited perceive the Hawkins-Stafford provisions as an opportunity to increase accountability for results in Chapter 1, and they have set up centralized procedures accordingly. For example, in one SEA that is identifying schools itself, the coordinator said of the new law, "It's got a more structured, documented approach. Districts don't want to admit that they have a bad program, so you've got to impose it on schools.... Hawkins-Stafford is kind of a threat, [but] to get schools off dead center you have to do that." Another SEA, where the coordinator hopes to use the law's leverage to help strengthen the state's work in school improvement, is taking an especially strong stand on exemptions for schools initially identified as in need of improvement: the coordinator does not expect to grant exemptions and is not publicizing the law's provisions in this area.

Officials in another SEA view the identification of schools in need of improvement quite differently, focusing primarily on the opportunity for districts to assess their own programs and needs. The SEA

provides four different criteria that districts may use in identifying schools, with the intention that districts will choose the criterion that yields a manageable number of schools. Local discretion is thus a key feature of the process.

Measures Used in Identifying Schools

In at least some districts in most states, the standard for aggregate achievement that triggers the school-improvement process is the one specifically mentioned in the federal regulations: no gain or a loss in NCEs. Twenty-seven coordinators reported that this standard is the only aggregate achievement standard used in school identification in their states (Table II-2). Another nine said it is used along with a higher standard (e.g., a gain of at least one NCE); the reason the process can include more than one measure is that local districts are setting their own standards for school identification in some states.

Table II-2

Standards for Aggregate Achievement, by Number of SEAs
(n=52)

Measure(s) Triggering School Improvement in the State	Number of SEAs
No gain or a loss in NCEs only	27
NCE gain greater than 0	16
Both measures	9

Table reads: Twenty-seven SEAs reported that the only aggregate-achievement level triggering school improvement in their state is no gain or a loss in NCEs.

In 16 states, schools are identified as in need of improvement if their gains fall below a higher standard--one or two NCEs. (The House Subcommittee on Elementary, Secondary, and Vocational Education reports that this is the case in 15 states; one of the SEAs reporting a higher standard on our survey did not respond to that survey.)

Our survey also asked about measures other than NCE gains on achievement tests that could be included in state standards for school improvement or in the desired outcomes set by local districts. As Table II-3 shows, all these other measures play a part in the identification process in at least some districts in some states--but all of them are more likely to be used in the states where local districts take the lead in identifying schools. Apparently, when the SEA takes part in identifying schools, it tends to use a relatively simple procedure based on pre- and posttest scores. When the process is more locally

controlled, however, the process can more easily involve locally available data such as student grades, attendance, retentions in grade, and dropout rates. Among the large number of SEA coordinators choosing the "other" response to this question, most (12 of the 16) simply used this space on the survey form to explain that the measures used are as varied as the desired outcomes that districts have specified.

Table II-3

Measures Other than NCEs Used to Identify Schools in Need of Improvement, by Number of SEAs

Measure	Among Those States Where Identification Is Done By ... LEAs (n=29)	SEA, Alone or With LEAs (n=19)	Total (n=48)
Sustained effects on tests	11	4	15
Grades	13	0	13
Attendance	13	0	13
Retentions in grade	12	0	12
Dropout rates	12	0	12
Students exiting from Chapter 1	9	1	10
Credits or graduation rates	9	0	9
Scores on state criterion-referenced test	8	1	9
Writing samples	6	1	7
Other	10	6	16

Table reads: In at least some districts in a total of 15 states, schools are identified as in need of improvement based on the sustained effects shown on Chapter 1 tests. This measure is used in 11 states where LEAs do the identification and in four states where the SEA participates in identification.

Consideration of Local Conditions

The law and regulations specify several possible junctures at which SEAs and school districts shall take local conditions into consideration in carrying out their program improvement responsibilities.

By a considerable margin, the SEA coordinators report that "identifying schools in need of improvement" is the step when local conditions are most likely to be considered (Table II-4).

Table II-4

Steps in the Improvement Process
When Local Conditions Are Considered
(n=53)

Step	Number of SEAs
Identifying schools in need of improvement	46
Identifying schools that continue to need improvement	30
Determining extent of services needed to meet desired outcomes	30
Determining how to measure substantial progress toward desired outcomes	29
Allocating resources to schools	24

Table reads: Forty-six SEAs report that local conditions are considered in identifying schools in need of improvement.

One reason for the pattern of responses in Table II-4 is probably that the responding SEAs had not yet reached some of the steps listed. For example, the allocation of resources to schools had not progressed far in many states at the time of the survey. The identification of schools that continue to need improvement will take place on only a limited basis before 1992-93.

In any case, the survey responses do not tell the full story. Several of the SEA coordinators we interviewed during site visits, while officially allowing the exemption of schools from improvement requirements on the basis of local conditions, said they are taking a dim view of such exemptions. As one described the process, a district can make the case that a particular school deserves exemption, but, "more than likely I'll say no."

Compiling a national total of exempted schools would be difficult, since it seems that nearly one-third of SEAs do not have data on the number of schools exempted. In answer to a survey question, 37 SEAs said they know which schools have been exempted, 10 said they do not, and six did not answer the question. However, data do exist on the number of schools identified as in need of improvement, and we now turn to these data.

Outcomes of the Identification Process

Based on responses from 53 SEAs, the number of Chapter 1 schools identified as needing improvement on the basis of 1988-89 data is 5,033. This number is approximately 10 percent of all Chapter 1 schools. (Our survey did not ask for the total number of Chapter 1 schools in each state, but the House survey did and obtained a figure of 45,812 schools in 49 states. If the total figure for all 53 jurisdictions is between 48,000 and 53,000 schools, as seems likely, then the number of schools identified is 10 percent of the total.) A total of 2,166 districts in 52 responding states have schools identified as in need of improvement, representing 15 percent of the districts in those states. The proportion of districts in a state that have schools identified as in need of improvement varies considerably. Even setting aside the SEAs that have only one district (where the proportion has to be either zero or 100 percent), the range is from zero to 88 percent. SEAs therefore face quite different situations as they begin to oversee improvement activities for the identified schools: some will concentrate their attention on a small proportion of districts, while others will need to make this oversight part of their routine program administration for most districts.

Our figure for the number of schools identified as in need of improvement is higher than that obtained in the House survey, which reported 3,552 schools identified in 43 states, or 9 percent of all Chapter 1 schools in the 42 states that could report both a number of identified schools and a total number of Chapter 1 schools. One reason for the difference in findings between the two surveys is our higher response rate. Another is the fact that some of our responses arrived two or (in one case) four months after the House survey ended. During the early months of 1990, some additional schools were undoubtedly identified, and SEAs also presumably continued to receive information about schools that had been identified earlier. Thus, an upward trend in the numbers during these months was to be expected.

The fact that districts and SEAs used data from 1988-89 to identify this group of schools has implications for the number of schools identified. Briefly, schools had easier standards to meet in 1988-89 and therefore were less likely to be identified as in need of improvement than they will be in subsequent years. Two changes in evaluation procedures mandated by the Hawkins-Stafford Amendments and going into effect in 1989-90 are expected to depress the level of achievement gains registered in many Chapter 1 schools: the assessment of more advanced skills as well as basic skills, and the use of a 12-month period between pre- and posttesting (rather than measuring fall-to-spring gains). Moreover, since districts had not identified their desired outcomes in 1988-89, the standard of substantial progress toward desired outcomes will take effect for the first time in analyzing performance data from 1989-90.

When asked to assess the accuracy of the identification process, SEA Chapter 1 coordinators professed a reasonable degree of satisfaction with it. The survey question was, "In your judgment, has the prescribed assessment process accurately identified LEAs whose Chapter 1 programs really need

improvement?" Among the 49 coordinators responding, 19 called the accuracy of the process "good," 26 "fair," and just 4 "poor." (We did not ask coordinators to judge the accuracy of the identification of schools, on the grounds that they would tend to be more familiar with the overall quality of district programs than with the quality of individual school programs.)

The number of schools identified as in need of improvement did not surprise most SEA coordinators (Table II-5). About half found that the number identified met their expectations, while the remainder are almost equally divided between those who found the number high and those who found it low. Furthermore, even those coordinators who question the accuracy of the process do not tend to quarrel with the number of schools identified. Among the 30 coordinators who called the accuracy of the identification process for district programs either fair or poor, 15 said the number of schools identified was about right. These coordinators are, however, somewhat more likely than their colleagues to have found the number of schools either lower or much lower than anticipated.

Table II-5

Comparison of Number of Identified Schools with Previous SEA Expectations
(n=50)

Number Identified Is ...	Number of SEAs
Much higher than anticipated	1
Higher than anticipated	9
About right	27
Lower than anticipated	10
Much lower than anticipated	3

Table reads: One SEA said the number of schools identified as in need of program improvement is much higher than anticipated.

Working with Schools in Need of Improvement

Our survey data portray only the early stages of work on improving Chapter 1 programs in the schools identified as in need of improvement. School districts are supposed to take the initiative in working with these schools, and although SEAs are required to follow the progress of local improvement efforts, districts may have taken preliminary steps early in the school year without communicating these steps to their SEA Chapter 1 offices. Thus, our data show an incomplete picture of work getting under

way. We have some indications, however, of the pace of progress at the school level and the types of outside assistance that SEAs are providing, coordinating, or learning about.

Progress in Implementing Improvement Plans

Schools in need of improvement do not have to have their improvement plans fully under way in 1989-90, but the regulations do require implementation to begin as rapidly as possible. We asked the SEAs to estimate how many of the identified schools in their states are fully implementing plans this year. Although 12 respondents were unable to make an estimate (and another two had no identified schools in their states), those who could make an estimate gave us a total figure of 994 schools fully implementing improvement plans. This number represents 26 percent of all identified schools in the 41 states from which we obtained responses. It may understate the total percent of schools whose improvement activities are in place this year, since SEAs do not necessarily know how fast local implementation is progressing. Among the 41 states making an estimate, six reported that all of those identified are fully implementing their improvement plans this year, and 19 reported that none of those identified are doing so.

Table II-6

Progress in Implementing Improvement Plans,
by Number of SEAs
(n=39)

Degree of implementation	Number of SEAs Reporting
No identified schools fully implementing improvement plans	19
1-36 percent of identified schools fully implementing plans	8
48-96 percent of identified schools fully implementing plans	6
All identified schools fully implementing plans	6

Table reads: Among the 39 SEAs that have schools identified as in need of improvement and can estimate how many are fully implementing their improvement plans in 1989-90, 19 said none of the schools are doing so.

Assistance Being Planned and Delivered

The law and regulations give SEAs a role in assisting districts with school improvement, and funds have been appropriated for state-administered grants for program improvement. However, the regulations do not specify particular modes of assistance. Instead, they specify a process of consultation at the local level that must precede the use of state program improvement funds: parents of Chapter 1 children, school staff, the district, and the SEA must jointly agree to the selection of assistance providers and the best use of the funds.

Given these requirements, SEA Chapter 1 offices are already providing various kinds of help from their own staff members to the districts that have schools in need of improvement, but they are moving more slowly to spend their grants for program improvement. As far as SEA Chapter 1 coordinators know (as of January 1990), their own offices are the primary source of assistance for districts with schools in need of improvement (Table II-7). The figures in this table reflect two factors: who is actually helping the districts, and what information the SEAs have about this help. Chapter 1 coordinators are, of course, most knowledgeable about the help their own offices have provided; many of them also have good information from Technical Assistance Centers (TACs) and Rural Technical Assistance Centers (R-TACs), which are required to coordinate their assistance through the SEA. The SEAs' information on the number of districts that have received help from other providers is probably incomplete. Nonetheless, there does not seem to be much diversity in the sources of assistance that districts are tapping thus far.

States plan to use a variety of methods in helping districts. When asked about strategies they might be expecting to use this year, most respondents declared that they plan to use most of the strategies (Table II-8). The least popular strategy is assistance from non-SEA staff, which 37 SEAs expect to use, while most of the remaining SEAs said they are not sure about using this approach.

In general, then, these findings show an initial reliance on the most familiar sources and modes of assistance with Chapter 1 programs. So far, the law's improvement requirements have not done much to bring new sources of ideas into the system. One reason may be that the special funds for assistance were not yet being spent at the time of the survey, outside of a handful of states.

The amount and kind of resources that will be available for school improvement are issues in several states we visited.

- SEA staff members in one of these states scaled back the stringency of their identification process as they realized--partly at the insistence of the committee of practitioners--that the number of schools identified should not overwhelm the amount of assistance available. A staff member said, "You have to be sensitive to the process involved in improvement. You can't just snap your fingers and make it work."

Table II-7

Percent of Districts with Schools in Need of Improvement
Using Particular Sources of Assistance, as Reported by SEAs
(n=44)

Type of Assistance Provider	Percent of Those Districts with Schools in Need of Improvement
SEA Chapter 1 office	78
Chapter 1 TAC or R-TAC	31
Another office in the SEA	10
Federally supported educational lab or center	5
Independent consultant	4
Institution of higher education	0
Other providers	1

Table reads: Of the school districts in responding states that have schools identified as in need of improvement, 78 percent have received assistance from the SEA Chapter 1 office.

Table II-8

Strategies that SEAs Will Use to Help in
Implementation of Improvement Plans

Strategy	Number of SEAs that Will Use
School improvement workshops or inservice training	51
Onsite assistance by SEA staff	44
Dissemination of exemplary programs or practices	42
Assistance from non-SEA staff	37

Table reads: Fifty-one SEAs plan to use school improvement workshops or inservice training as a strategy for helping districts implement their improvement plans.

- Key resources for school improvement will include the Chapter 1 TACs and R-TACs and the expected grants for state program improvement. Several of these SEAs expect to rely on their TACs for a great deal of help with local improvement, although some are experiencing difficulty in the transition to new TAC contractors that replaced some of the previous ones in 1988.

Plans for the disbursement of state program improvement grants are less clear at this point. A total of $5,686,000 has been allocated for these grants nationwide. The allocation for most SEAs is a floor amount of $90,000, while the 10 largest SEAs are allocated larger amounts. At the time of our survey, just eight SEAs reported that they had expended any of their funds. Forty-four SEAs responded to a question about plans for the use of the grant funds, but of the $4.5 million that the respondents control, about half (52 percent) will be used in ways that have not yet been determined (Table II-9). No SEAs expressed an intention of keeping the funds in the SEA (i.e., using the funds to reimburse the regular Chapter 1 account for assistance that their own staff members provide to districts)--even though the SEA Chapter 1 offices have been the dominant source of assistance, as far as the coordinators know.

Table II-9

Plans for Spending State Program Improvement Grants in 1989-90
(n=44)

Expenditure Category	Percent of Funds to be Expended
Spending plans not yet determined	52
Cash grants to districts to cover improvement costs	41
Payments to providers of assistance	5
Other	2
Total	100

Table reads: Of the total amount of state program improvement grants to be spent in the responding states in 1989-90, 52 percent will be spent in ways that have not yet been determined.

The states we visited appear typical, in that their plans for spending the state grants for program improvement were not entirely worked out in the fall of 1989.

- One SEA was considering awarding minigrants to school districts that are doing well.
- Two SEAs planned to make the money available on a proportional basis to districts that have schools identified as in need of improvement, and the coordinators expected the districts to engage the services of local consultants or nationally known experts.

Coordinators in both of these states were following this procedure in conformity to their understanding of the law, even though they believed their own work with districts could be greatly strengthened if they could afford to hire new SEA staff.

- A fourth SEA planned to distribute its grant to districts, with an equal amount going to each identified school. The coordinator's goal was to get $2,000 to each building, even if it meant using additional state administrative funds. The two districts hardest hit by the program improvement requirements were to receive a total of $40,000 to $50,000 of state administrative funds. (One of these districts had already made a commitment to match these state funds.) A sizable amount of carryover funding at the state level is making this state largesse possible.

- The fifth SEA, on the other hand, planned to use at least part of the grant to support assistance from the SEA staff. In a memorandum to local coordinators, the SEA said, "We in the [SEA office] of Chapter 1 are your partners in the improvement process, and we are prepared to provide services for you.... Please indicate which of the services listed below would be helpful to your program this year so that we can draw up tentative plans for utilizing our staff and other resources available to you." The options listed included help from outside consultants but also individual help, regional workshops, conferences, and inservice training provided by SEA staff.

For the schools that will be engaging in improvement plans, the states we visited have ideas about appropriate self-assessment procedures, and four of the five states have drawn these ideas from the effective-schools literature of the 1970s. Three of them are offering districts a self-assessment checklist; all of these resemble one another, as well as resembling the 13 attributes of effective Chapter 1 programs publicized by ED since the early 1980s.

A fourth SEA has already incorporated into its monitoring an assessment of several factors associated with school effectiveness. These factors were originally identified in a project which, like the original 13 attributes, drew heavily on the effective-schools literature. Building on this project, the state developed a system in which Chapter 1 schools with poor performance received assistance from several sources, including specially trained teams from high-performing Chapter 1 schools. The problem with this system was that it reached only seven or eight districts each year. Therefore, elements of the system will now be incorporated not only into routine monitoring but also into the efforts to improve identified schools.

Unlike the SEAs whose guidance for program improvement is more directly grounded in the 13 attributes, a fifth SEA sent out a program advisory in October 1988, introducing the Hawkins-Stafford Amendments and stressing the philosophy of a challenging instructional program with minimal distinctions among funding sources. This program advisory gives prominence to the Hawkins-Stafford provisions dealing with "more advanced skills" and the provision allowing joint staff development for all staff members who work with Chapter 1 students.

Attention Paid to the New Improvement Provisions

While it might seem self-evident that a significant statutory change like the new Hawkins-Stafford provisions for program improvement would automatically garner intense attention from state and local officials, in fact new laws often need time to make their effects felt throughout the intergovernmental system. Thus, we investigated the prominence of the new requirements in several arenas of program administration: state rulemaking, application development and review, monitoring, and technical assistance (including assistance both to and from SEAs). We also asked about the degree of controversy associated with each novel procedure for program improvement.

State Administrative Activities Regarding the New Improvement Provisions

The effects of the new provisions for school program improvement and student program improvement have varied across the different arenas of Chapter 1 administration. Briefly, the improvement provisions have been prominent concerns in state rulemaking and technical assistance, while being overshadowed by other concerns in application review and monitoring. These findings are logical, in that new legal provisions tend to require new state rules or policies and to create new assistance needs, while application review and monitoring are highly routinized procedures that are not easily altered. (For a more complete discussion of each of these arenas of program administration, readers should turn to the fourth chapter of this report.)

State Rulemaking

The terminology of rulemaking varies a great deal from state to state. Often, SEAs prefer to call their Chapter 1 requirements "policies" or "guidelines" rather than "rules"; they may even avoid all these terms and simply issue memos. Therefore, SEAs vary in whether they would classify their state program improvement plans as rules, policies, or neither. Our survey, which each SEA interpreted according to its own terminology, elicited the information that the provisions for school program improvement have been relatively prominent topics for state rules or state policies. Nine SEAs have issued state rules concerning the identification of schools in need of improvement; the same number has issued rules concerning plans for working with such schools. No other issue area has occasioned so much rulemaking. Similarly, these two areas have drawn the greatest amount of attention in state policymaking: 28 SEAs have issued policies concerning both school identification and plans for working with schools. The only other areas that have been the subjects of policies in at least 20 states are comparability and another aspect of program improvement--student program improvement.

The identification of students who are not making gains in Chapter 1 has been the subject of state policies in 21 SEAs. Five SEAs have issued rules on this topic.

Application Development and Review

The new improvement provisions were not an especially prominent topic on local applications for the 1989-90 school year (Table II-10). It is reasonable to assume that this reflects the timing of the final regulations' release--in May 1989, at a time when states have typically designed the application form for districts to use and have held one or more workshops to introduce this form to the coordinators who will be filling it out. Furthermore, the SEAs that planned to identify schools in need of improvement themselves did not have to ask their districts to describe procedures for school identification.

Table II-10

School Program Improvement as a Topic on Local Applications

Topic	Number of SEAs ... Requiring a narrative	Requiring an assurance	Omitting from application
Plans for identifying schools in need of improvement (n=53)	19	4	30
Plans for working with identified schools schools (n=52)	16	4	32

Table reads: Nineteen SEAs' application forms for local districts require a narrative description of procedures for identifying schools in need of improvement.

Not surprisingly, then, the provisions for school program improvement were not among the most common problems cropping up on local applications for 1989-90. Our survey asked respondents about 19 program areas that could draw state and local attention in application review and at other stages of program administration. The fourth chapter of this report shows the array of all 19 areas and the amount of attention that each one gained at each stage. In this chapter, we focus on the three areas that fall under the new provisions for program improvement: identification of schools in need of improvement, plans to work with schools in need of improvement, and identification of students not making gains. Table II-11, for example, shows the prominence of each of these areas as a problem at the application stage. The first column gives the percent of the responding SEAs who said that each area was one of the five areas most likely to cause problems on local applications; the second column indicates the percent who said it caused any problems at all at the application stage; and the third column shows the rank of this area among the 19 listed on the survey (measured by the number of respondents who said it posed any problems at all).

Table II-11

Provisions for Program Improvement as a Subject of Problems in Applications (n=51)

Area	Number of SEAs Calling the Area ... One of the 5 major problem areas	A problem area	Rank among 19 Areas in Survey
Identification of schools in need of improvement	7	22	16th
Plans for working with schools in need of improvement	5	19	18th
Identification of students not making gains	6	19	17th

Table reads: Responding to a list of 19 areas within Chapter 1, seven SEAs said the identification of schools in need of improvement is one of the five major problem areas in local applications.

However, the picture changes when we look more closely at those SEAs that included a narrative about schools in need of improvement on their application form. Among the 19 SEAs that asked for a narrative description of procedures for identifying schools, 12 said that this part of the application posed some problems, and six of the 12 ranked it among the five areas most likely to pose problems. Similarly, among the 17 SEAs that asked for a narrative on plans for working with schools in need of improvement, 10 said that this part of the application posed problems, and five ranked it among the five areas most likely to pose problems.

Monitoring

In onsite monitoring of school districts by SEA Chapter 1 staff, the new provisions for program improvement have been a somewhat more prominent focus than they were in local applications (Table II-12). Large majorities of SEAs report that each of these provisions has been a focus of monitoring--although, to put these numbers in perspective, over half of the responding SEAs cited 17 of the 19 areas we listed as areas that they monitor onsite (omitting only maintenance of effort and innovation projects). In monitoring, a difference emerges among the different improvement provisions. Issues of student program improvement have been just as likely to be a focus of monitoring as the school-level improvement issues, yet they were less often ranked as a top priority for monitoring. This indicates that

SEAs are reviewing district policies and procedures on student program improvement but not focusing a great deal of attention on this very new area of Chapter 1 practice.

Table II-12

Provisions for Program Improvement as a Focus of SEA Monitoring (n=52)

Area	Number of SEAs Calling the Area ... One of the 5 top priorities	A focus of monitoring	Rank among 19 Areas in Survey
Identification of schools in need of improvement	11	41	13th
Plans for working with schools in need of improvement	11	40	15th
Identification of students not making gains	5	44	11th

Table reads: Responding to a list of 19 areas within Chapter 1, 11 SEAs said the identification of schools in need of improvement is one of the five top priorities in monitoring visits.

Technical Assistance

Finally, in technical assistance, the new provisions have been quite a prominent focus for SEAs--although, again, there is more emphasis on school improvement than student program improvement (Table II-13). Contrasting this table with the previous one, it seems that SEAs are somewhat more likely to characterize school program improvement as an area where districts need help than as an area where the SEA needs to patrol for violations. This reinforces the finding, cited earlier, that SEAs see themselves as a major source of help for the districts that have schools in need of improvement.

Another side of technical assistance is the assistance that the SEAs themselves have received from their TACs and R-TACs. By a considerable margin, the SEA program improvement plan has been the topic on which SEAs have received the greatest amount of hands-on assistance from their TACs; 46 of them report that the TAC or R-TAC "worked with us as we developed our plan." (The area in which they were the next most likely to have received this type of help was that of the committee of practitioners, where 30 chose the same response.) Only one state reported receiving no help from the TAC or R-TAC with the SEA program improvement plan. Forty-five SEAs said that the TAC or R-TAC

"informed us about what other states are doing" in this area, and 36 said that the TAC or R-TAC "provided information about federal requirements."

Table II-13

Provisions for Program Improvement as an Area of Local Need for Technical Assistance (n=52)

Area	Number of SEAs Calling the Area ... One of 5 greatest local needs	An area of need	Rank among 19 Areas in Survey
Identification of schools in need of improvement	15	47	4th/5th (tie)
Plans for working with schools in need of improvement	24	47	4th/5th (tie)
Identification of students not making gains	11	43	12th/13th/14th (tie)

Table reads: Responding to a list of 19 areas within Chapter 1, 15 SEAs said the identification of schools in need of improvement is one of the five areas of greatest local need for technical assistance.

Controversies Associated with New Improvement Provisions

We asked the SEAs to rank seven aspects of the development of the state program improvement plan according to the amount of controversy that each one engendered. If an aspect of the plan was not controversial at all in the state, the SEA was asked to say so. As Table II-14 shows, the state establishment of aggregate performance standards has been the most controversial aspect of the improvement process so far. In general, the dominant issues have had to do with standards for identifying schools in need of improvement, as well as the overall timetable for the improvement procedures. The allocation of funds for program improvement has been less controversial--perhaps because, as we have seen, it has not taken place everywhere as yet. Among the three SEAs ranking the "other" category as the most controversial, two said that they needed regulations and information from ED sooner, and one said that "the definition of 'substantial progress'" has been the most controversial issue.

Table II-14

Controversial Aspects of Planning for Program Improvement
(n=51)

Aspect	Number of SEAs Rating the Aspect ... The most controversial	Among the 3 most controversial	Not controversial
State establishment of aggregate standards	16	26	20
Program improvement timetable	10	24	15
Exemptions due to local conditions	8	25	17
Local determination of desired outcomes	7	25	17
Progam improvement fund allocation	4	6	27
Timing of SEA plan's release	1	7	27
Role of the committee of practitioners	0	3	34
Other	3	5	44

Table reads: Sixteen SEA respondents said the state establishment of aggregate performance standards has been the most controversial aspect of the program improvement plan.

Summary

- In most states (31), districts make the initial identification of schools in need of improvement. However, 22 SEAs make the identification themselves or participate in identification. Forty SEAs reserve the right to decide whether schools are to be exempted from improvement due to local conditions.
- The lowest permissible standard for aggregate achievement (i.e., school improvement is triggered when there is no gain or a loss in NCEs) is used in some or all districts in 36 states. Sixteen SEAs reported that a higher standard is the only one used in their states.
- The measures used in identifying schools are more diverse in those states where districts make the initial identification. Districts are fairly likely to use student grades, attendance, retentions in grades, and dropout rates in identifying schools.
- SEAs reported that 5,033 schools in 2,166 districts have been identified as in need of improvement. Nationwide, 15 percent of districts have at least one school in need of improvement.

- SEAs reported that about 26 percent of the identified schools are fully implementing their improvement plans this year.

- The SEA Chapter 1 offices reported that they have already provided assistance to the great majority (78 percent) of the districts with schools identified as in need of improvement. Substantively, our site visits suggest, much of the help offered by SEAs may be grounded in the effective-schools literature of the 1970s. The SEAs also know that the TACs or R-TACs have helped 31 percent of these districts. As far as SEA coordinators know, no other type of assistance has been very common so far.

- Spending plans for the state program improvement grants were not clear as of January 1990.

- The program-improvement provisions were not a major focus for SEA activity in application review or monitoring, but improvement at the school level is an area in which they perceive relatively widespread local needs for technical assistance. The identification of students who are not making gains--the first step in student program improvement--has not been a focus of SEA administrative activity this year.

- Controversies at the state level have revolved around the identification of schools in need of improvement, especially the state establishment of aggregate standards for student performance, and the timetable for program improvement. The allocation of improvement funds, the timing of the SEA plan's release, and the role of the committee of practitioners have not been widely controversial.

III. How SEAs Have Handled Other New Provisions

Besides introducing the new methods of program improvement whose early implementation we have just described, the Hawkins-Stafford Amendments altered other features of the Chapter 1 program. This chapter describes the SEAs' initial responses to several statutory changes intended to make the program more responsive to its constituencies and more educationally effective. The chapter discusses, in turn, the committees of practitioners formed to advise SEAs, parent involvement in local programs, coordination between Chapter 1 and other educational services, schoolwide projects, and innovation projects.

Committees of Practitioners

The Hawkins-Stafford Amendments added a new step to the state rulemaking process: consultation with a committee of practitioners, which must include administrators, teachers, parents, members of local boards of education, and representatives of private-school children. Each SEA has been required to form a committee and to have the committee review the state program improvement plan. In addition, the committees must review "major" rules and regulations or, in the absence of formal rules, must review "policies that the SEA and LEAs are required to follow" (34 CFR 200.70(e)(2)).

SEAs could form their committees in different ways, including designating an existing advisory committee to serve this function or drawing most members from an existing committee. The regulations encouraged, but did not require, that SEAs seek recommendations for committee members from appropriate organizations.

Committee Formation and Membership

In fact, according to our survey, 49 SEAs appointed new committees. Three drew most of the members from an existing committee, and one SEA relied on a previously existing committee. In looking for committee members, only three SEAs reported that they did not seek nominations from sources outside the SEA. The types of constituencies most often consulted were administrators in school districts, local Chapter 1 coordinators, representatives of private schools, and local superintendents. The survey distinguished between organizations and individuals as sources of nominations, and, in general, we found that SEAs were more likely to consult with individuals than with organizations representing particular constituencies. Table III-1 shows the 10 sources of nominations for committee members that at least 20 SEAs consulted.

Nationwide, the committees of practitioners have a grand total of 945 members. The average committee, therefore, has 18 members; the range of committee sizes is from seven to 51 members. We

Table III-1

Sources Contacted for Nominations to the Committee of Practitioners (n=53)

Source	Number of SEAs Contacting
Individual administrators in LEAs	31
Individual Chapter 1 coordinators	29
Individual teachers	29
Organizations representing private schools	28
Organizations representing local boards of education	26
Individual superintendents	25
Individual Chapter 1 parents	24
Individuals in the SEA	22
Individual parents	21
Individuals in private schools	20

Table reads: To obtain nominations for members of the committee of practitioners, 31 SEAs reported that they contacted individual administrators in local education agencies.

obtained information on the committees' composition from all but one of the 53 SEAs, with the results shown in Table III-2. SEAs were asked to provide a duplicated count of their committee members–that is, a member belonging to more than one of the specified categories would be counted twice. The table shows that the constituencies most heavily represented are Chapter 1 coordinators, teachers, parents, and local administrators other than Chapter 1 coordinators (e.g., superintendents or curriculum supervisors. If there were such a thing as an "average" committee, it would comprise four local Chapter 1 coordinators, three teachers, three parents (two of whom have children who are currently Chapter 1 participants), two local administrators, two SEA staff members, one or two members of local boards, and one or two representatives of private-school children, one or two principals, and another member. The "other" category is diverse, including instructional aides, evaluation specialists, and regional administrators.

Table III-2

Representation of Groups on Committees of Practitioners (n=52)

Group	Total Number of Committee Members	Percent of All Committee Members
Local Chapter 1 coordinators	215	24
Teachers	155	17
Parents	154	17
... of current Chapter 1 students	92	10
... of former Chapter 1 students	26	3
... other parents	36	4
Local administrators other than Chapter 1 coordinators	111	12
SEA staff	89	10
Members of local boards	74	10
Representatives of private-school children	71	8
Principals	69	8
Other	38	4

Table reads: Nationwide, 215 local Chapter 1 coordinators belong to committees of practitioners. They represent 24 percent of all committee members in the responding states.

What the Committees Have Done

The largest group of SEAs named the members of the committee of practitioners in January 1989 and convened the first committee meeting in February 1989. The first committee was named in September 1988; the last among the states reporting on this point was named in March 1990. On average, the committees had met three times by December 1989.

The state program improvement plan has been subject to consideration by the committee in all responding states. Although the extent of the committees' involvement at different stages of preparing the plan has varied across states, most committees have been most heavily involved in commenting on an initial draft of the plan and deciding on its final contents (Table III-3). Relatively few committees did

much in the initial writing of the plan, and the committees' involvement in soliciting comments from others varied in intensity across states. The committee's role in program improvement has been uncontroversial in two-thirds of states, and among the remaining states only three ranked it as one of the three most controversial aspects of program improvement.

Table III-3

Involvement by the Committee of Practitioners in Developing SEA Program Improvement Plan (n=51)

Aspect of Development	Number of SEAs Rating Involvement ... Extensive 1	2	3	4	None 5
Initial writing of plan	8	4	12	5	22
Commenting on initial draft	41	9	1	0	0
Soliciting comments from others	15	9	15	8	3
Deciding on final contents of plan	37	10	3	1	0

Table reads: Coordinators in eight SEAs said the committee of practitioners has had extensive involvement in the initial writing of the SEA program improvement plan.

Some of the coordinators we interviewed on site visits, but not all, reported that the committees have played an active part in shaping the state program improvement plan:

- One SEA's manager of program improvement, who chairs the committee meetings, reported that her original ideas changed completely as a result of members' comments. Bringing the practitioners' perspective to the forefront, the committee persuaded her that the improvement plan needed to be "streamlined" rather than "a heavy regulatory process." Along these lines, she says, "they convinced me that zero gain is really still growth ... as long as [students are] not falling back, something good .nust be happening."

- Another state's committee has also softened the requirements of the program improvement plan. The SEA originally required that "substantial progress" must consist of a 15 percent gain on two out of three measures: NCE gains, school grades, or grade-level proficiency. Because of the committee's comments, a less stringent standard was being negotiated at the end of 1989.

- The committees' influence has been more modest in two other states we visited. Both SEAs have convened their committees, which have reviewed the materials they are supposed to review. One coordinator characterized his committee as "very helpful in fine tuning adjustments."

Committees of practitioners have not reviewed rules, regulations, or policies in all states. Nineteen coordinators reported that the committees have not done so in their states. Among the remaining states, the nature of the committees' involvement is diverse. However, as in the review of the program improvement plans, the committees have been most actively involved in commenting on initial drafts and deciding on the final contents of rules or policies (Table III-4). An example of relatively vigorous committee involvement comes from one SEA we visited, where the committee actively reviewed the application process, monitoring guidelines, capital-expenditure procedures, and mechanisms for distributing all funds. At the time of our visit, the committee was preparing a response to ED's draft policy manual.

Table III-4

Involvement by the Committee of Practitioners in Developing Rules, Regulations, and Policies (n=52)

Aspect of Development	Number of SEAs Rating Involvement ... Extensive 1	2	3	4	None 5
Initial writing of rule or policy	7	4	4	7	29
Commenting on initial draft	23	9	0	0	2
Soliciting comments from others	8	7	10	4	25
Deciding on final contents of rule or policy	18	8	2	2	21

Table reads: Seven SEAs said the committees had extensive involvement in writing major rules, regulations, or policies.

Parent Involvement

Although some form of parent involvement has been a feature of Chapter 1 and its predecessor, Title I, since the earliest days of the program, the aims and methods of involving parents have shifted over the years. During the 1970s, the Congress increasingly tightened the requirements dealing with parents' advisory role in Title I projects, so that by the end of the decade each participating district and school needed a parent advisory council. The advent of Chapter 1 in 1981 removed these requirements,

substituting a more general mandate for consultation with parents. During the 1980s, and culminating in the Hawkins-Stafford Amendments, the focus has increasingly shifted to parent involvement in the educational programs of their own children. The Hawkins-Stafford Amendments retain the requirement for parent input in program planning, design, and implementation (which can occur through parent advisory councils or other means); but they also require districts to inform parents about their children's program, and they authorize districts to provide materials, training, and assistance for parents to work with their children at home.

Capacity of SEAs to Promote and Support Parent Involvement

Most SEA Chapter 1 offices (38) have no staff members whom they would characterize as parent specialists. Nationwide, eight full-time-equivalent staff positions in SEA Chapter 1 offices are devoted to parent involvement. However, SEAs draw on the resources of TACs and R-TACs to complement their small staff capacity in parent involvement. Forty-six SEAs reported that their TAC or R-TAC provided some help in this area, primarily providing information about federal requirements (to 37 SEAs) and informing the SEA about what other states were doing (36 SEAs). A smaller number of SEAs, 21, received help from the TAC or R-TAC in developing a plan for parent involvement. In addition, parents of current or former Chapter 1 participants belong to the committees of practitioners, constituting 13 percent of committee members nationwide. In individual states, Chapter 1 parents constitute between 5 and 22 percent of committee members.

Administrative Procedures Related to Parent Involvement

Although the federal regulations concerning local applications do not require a narrative description of plans for parent involvement, 44 SEAs did so in 1989-90--an increase from 40 in the previous year. Comparing our survey findings with those reported by the National Assessment of Chapter 1 in 1987, we see a steady decrease in the percent of SEAs that require only an assurance on parent involvement, from 13 (out of 50) in 1985-86 to 12 (out of 53) in 1988-89 and 9 (out of 53) in 1989-90.

Parent involvement has been a prominent concern in all types of interactions between SEAs and districts during 1989-90 (Table III-5). First, SEA staff reviewers have scrutinized the narratives that they require on districts' applications and have frequently commented on the efforts that districts propose in parent involvement. Forty-four SEAs contacted at least some districts because of problems in the part of their applications dealing with parent involvement, and 22 termed this area one of the five in which problems most frequently occurred.

Parent involvement is an even more prominent focus of attention in monitoring and technical assistance. In both of these administrative arenas, two-thirds of respondents termed it one of the top

five concerns in their states. Only student eligibility and selection is monitored by more SEAs than parent involvement, and only program design is termed an area of local need for technical assistance by more SEAs. Parent involvement is, in fact, the area most often cited as one of the five greatest areas of local need for technical assistance.

Table III-5

Prominence of Parent Involvement as an Issue in Application Review, Monitoring, and Technical Assistance

	Number of SEAs Calling Parent Involvement...		Rank among 19 Areas on Survey
	One of the 5 major problems, priorities or needs	A focus or a need	
In applications (n=51)	22	44	4th/5th (tie)
In monitoring (n=52)	35	51	2nd/3rd/4th (tie)
In technical assistance (n=52)	34	48	2nd/3rd (tie)

Table reads: Responding to a list of 19 areas within Chapter 1, 22 SEAs said parent involvement is one of the five major problem areas on local applications.

As Table III-6 shows, SEAs are providing or planning a range of technical assistance with parent involvement. More than half of those responding have already disseminated existing materials on parent involvement, conducted seminars or workshops for staff members, and worked with districts on involving parents in decisions or on coordinating parent involvement with the regular instructional program. Almost all SEAs expect to have worked with districts on evaluating parent involvement before the end of the year. The three least frequent types of technical assistance are labor intensive or require direct expenditures. Compared with other types of assistance, relatively few SEAs have developed materials for parents or staff. Only three states have provided demonstration grants to help districts develop programs for parent involvement.

Table III-6

SEA Technical Assistance Methods
for Parent Involvement, 1989-90

Type of Assistance	Number of SEAs that ... Have offered	Plan to offer	Will not offer
Dissemination of information from other sources	41	9	1
Seminars or workshops for staff	37	13	3
Consultation on parent involvement in decisionmaking	32	13	8
Consultation on coordinating parent involvement with regular programs	30	10	11
Disseminaion of SEA-developed information	27	13	13
Seminars or workshops for parents	25	11	4
Consultation on evaluating parent involvement	23	23	2
Development of materials for parents	19	14	17
Development of inservice-training materials	13	22	17
Provision of demonstration grants	3	6	44

Table reads: Forty-one SEAs report that they have disseminated information on parent involvement developed outside the SEA.

Priorities of SEAs in Parent Involvement

The Hawkins-Stafford Amendments set forth a number of goals in parent involvement, which can be grouped into six types of goals. SEAs' responses to a question about the types of parent involvement activities they are promoting, shown in Table III-7, can be analyzed to determine the relative emphasis that SEAs, as a group, are placing on each goal. Probably the most important data are those concerning the percent of SEAs strongly promoting particular activities. Given their limited staff, it is doubtful that SEAs have a powerful influence on districts in areas where they report moderate or limited promotion.

Table III-7

Extent of SEA Promotional Efforts for
Particular Activities in Parent Involvement

Activity	Number of SEAs Reporting ... Strong Promotion	Moderate Promotion	Little/no Promotion
Informing parents about their child's school performance	46	5	2
Increasing parent involvement in Chapter 1 decision-making groups	29	19	4
Training parents to help their child with homework	27	17	9
Training teachers about parents' role in their children's education	26	18	9
Increasing parent attendance at school functions	21	29	3
Disseminating home-based education activities	19	25	9
Allocating staff time to coordinate parent involvement	17	28	8
Training teachers in use of parent conferences	16	21	18
Using parents as classroom volunteers or aides	9	27	17
Offering special services for parents who lack literacy skills or whose native language is not English	7	27	19
Operating parent resource centers	6	19	27

Table reads: Forty-six SEAs report that they strongly promote local activities to inform parents about their child's school performance.

A first goal embodied in the law is to inform parents about the reasons and purposes for their children's participation in Chapter 1; a second, complementary goal is to consult with parents regularly to help them become partners in the education of their children. SEAs' actions are in accord with this mandate; 46 are strongly encouraging districts to inform parents about their children's academic performance. A third goal in the law is to provide a range of opportunities for parents to become

informed about how Chapter 1 is operated and evaluated, and to collaborate with the staff. Over half of SEAs (29) strongly promote increased parent involvement in decisionmaking groups.

A fourth goal is to train teachers, principals, and other staff members involved with Chapter 1 to work effectively with parents. Here, the SEA response is more mixed. Half (26) are strongly promoting training for teachers about the role of parents in the education process, but fewer (16) are promoting training for teachers to improve their use of parent conferences. To help coordinate services, 17 strongly promote the allocation of staff time to parent issues.

Some SEAs have responded to a fifth goal, that districts support parents and teachers in developing partnerships between home and school to attain instructional objectives. The most common priority related to this goal is training parents to work with their children on homework, an activity strongly promoted by 27 SEAs. However, SEAs are less likely to promote other activities that involve parents in instruction. For example, 19 are strongly encouraging the dissemination of home-based education activities, and only nine are promoting parent involvement in the classroom as volunteers or aides. The least widespread priority, found among six SEAs, is the local operation of resource centers which give parents and teachers a place to develop partnerships.

A final goal in the law is the provision of special services to ensure participation by parents who lack literacy skills or whose native language is not English. Relatively few states (seven) are strongly promoting special activities to pursue this goal.

In the SEAs we visited, the response to the new Hawkins-Stafford emphasis on parent involvement has been diverse. Each SEA places a somewhat different interpretation on local parent involvement and the state role in encouraging it. The proportion of Chapter 1 staff time spent on parent involvement varies somewhat from state to state, although not dramatically.

- The coordinator in one state told us that the primary focus of his office over the next five years will be parent involvement. "We're doing all we can with the kids," he said, "and it doesn't mean a thing if you can't get to the parents." One staff member spends half of her time on parent-related activities, which the coordinator would like to expand to full time. This SEA's activities in parent involvement revolve around training for parents. The office has developed a set of take-home instructional activities and offers two workshops in the spring for parents, with assistance from the TAC. The aim is to train parents to become better educators of their children.

- A second Chapter 1 office, despite its small size, is making some attempts to call educators' attention to parent involvement. "Schools do not yet understand and may never appreciate the power of parents," an SEA staff member said. She explained, "We're very limited in staff, but through inservice, leadership, and extra time, we're getting a lot of things done and empowering the teachers to work with parents." The state is disseminating two types of resources developed by teachers: Reading Kits for parents to use at home; and a videotape, "An Introduction to Chapter 1." The SEA used to distribute a newsletter to parents but can no longer afford to do so.

- A larger SEA has a parent involvement office, and a member of the Chapter 1 staff spends about one-third of his time on parent involvement. He has conducted local workshops around the state in conjunction with the PTA and other organizations, emphasizing among other things the value of parent advisory councils. A three-year-old Home-School Partnership Program, the major state initiative in this area, is linked to the Chapter 1 parent

involvement activities. This program is voluntary for school districts, and its current priorities are coping skills for parents, assistance to single parents, and encouragement of parent involvement at school.

- A fourth SEA's work in Chapter 1 parent involvement primarily reflects the SEA's strong sense of responsibility for preventing audit exceptions. The SEA staff has drawn directly from the federal Chapter 1 regulations the list of nine specific requirements for parent involvement, and it requires local applications to have objectives in all nine areas. Each district must then keep a set of nine folders, one documenting activities related to each objective, for monitors to inspect onsite. Although parent advisory councils have continued in about one-third of this state's districts, the SEA does not require such councils and puts no special staff resources into overseeing them (except to confirm the existence of any council activities that are part of a local application).

- The fifth SEA's staff members are doing less to promote parent involvement than in past years. One staff member was spending 10 percent of her time on parent involvement at the time of our visit. She published a quarterly newsletter for parents and teachers, and she worked with the state's Family Involvement Coordinator to ensure consistency in policies (e.g., on the parent issues that are a focus of monitoring) and to train local staff in the integration of parent initiatives (e.g., how to fund activities jointly from different funding sources, including Chapter 1). She has also published a "Parent Involvement Handbook for School Staff," explaining the Hawkins-Stafford requirements and providing detailed examples of effective programs. Among her priorities are (1) frequent parent-teacher meetings, (2) parent education, (3) teacher training dealing with ways parents can support their children's education, and (4) strategies to help rural schools provide opportunities for parent participation.

It is somewhat difficult to infer just what message comes through to school districts from each of these SEAs' work in Chapter 1 parent involvement. The first SEA discussed above maintains a strong focus on parent training, but the other states are pursuing more diverse collections of priorities in parent involvement. Like the Hawkins-Stafford Amendments themselves, which refer often to parent involvement but do not define it in a particularly focused way, these SEAs seemed to be pursuing a broad-gauged agenda in parent involvement with rather limited resources.

District Activities in Parent Involvement

Although SEAs have only imperfect information about the activities taking place in districts, the survey responses provide some information about the prevalence of various types of activities and the rate of increase in their prevalence. For example, to the best of the SEAs' knowledge, districts mirror the SEAs' own emphasis on parent-teacher conferences as a vehicle for parent involvement (Table III-8). This is the only activity reportedly under way in a majority of districts (70 percent in the responding states), and its prevalence has increased by 14 percent since last year in those states that could give estimates for both years. (There is probably some upward bias in the percents shown here, since we have data only from those SEAs that can estimate the prevalence of an activity--a group that probably includes the SEAs that encourage the activity and excludes the ones that are indifferent to it.)

Table III-8

Prevalence of, and Increases in,
Local Activities in Parent Involvement

Activity	Number of Districts, 1989-90	Percent of Districts, 1989-90	Percent Change Since 1988-89*
Chapter 1 parent conferences (n=48)	8,420	70	+14 (n=44)
Dissemination of home-based education activities (n=45)	4,230	37	+60 (n=41)
Parent advisory councils (n=42)	3,327	31	+7 (n=38)
Parents as classroom volunteers, tutors, or aides (n=40)	2,766	28	+14 (n=36)
Liaison staff working with parents, training teachers or coordinating (n=46)	2,128	18	+23 (n=42)
Parent resource centers (n=43)	972	9	+73 (n=40)
Special strategies for parents who lack literacy skills or whose native language is not English (n=45)	876	8	+41 (n=41)

* Based on the number of states shown, where SEAs provided estimates for both years.

Table reads: In 1989-90, 48 SEAs reported that 8,420 districts are having Chapter 1 parent conferences. This is 70 percent of the Chapter 1 districts in these states. In the 44 states for which we have two estimates, there has been a 14 percent increase in districts holding conferences since 1988-89.

An activity that seems to be catching on rapidly is the dissemination of home-based education activities to reinforce classroom instruction. SEAs estimate that over one-third of their districts are disseminating home-based activities, representing a 60 percent increase since 1988-89--even though this is not one of the forms of parent involvement that the SEAs say they are promoting most vigorously. The smallest increase has taken place in parent advisory councils. Although the percent of districts with councils has risen by 7 percent since last year, to 31 percent, it has declined overall since 1985-86, when a survey conducted for the National Assessment found that 44 percent of districts had advisory councils. Finally, the table shows growth but small absolute numbers in two activities that SEAs are not promoting heavily, parent resource centers and special strategies for parents who lack literacy skills or whose native language is not English.

Coordination with Other Educational Services

Coordination between Chapter 1 and both the regular education program and other special services has been a concern of federal policymakers and program administrators for many years. The Hawkins-Stafford Amendments formalized this emphasis, discussing coordination as a subject to be addressed in local applications and as a means of improving performance in schools in need of improvement.

SEAs responded to the heightened emphasis on coordination by increasing the specificity of the application requirements in this area. In 1988-89, before the Hawkins-Stafford Amendments took effect, the applications in 25 states asked for a description of coordination between Chapter 1 and the regular instructional program, as opposed to simply an assurance. The following year, the number asking for a description rose to 35. The same trend is evident with respect to coordination with other federal and state programs: in 1988-89, 11 SEAs asked for a description in this area; the next year, 19 did so.

The application requirements concerning program coordination have posed relatively few problems, compared with other parts of the application (Table III-9). Neither type of coordination has caused an especially large number of problems at the application stage in more than a handful of states. Coordination with the regular program has, however, been more likely to do so than coordination with other federal and state programs.

Table III-9

Program Coordination as a Subject of Problems in Applications (n=51)

Area	Number of SEAs Calling the Area ... One of the 5 major problem areas	A problem area	Rank among 19 Areas on Survey
Coordination with the regular program	7	32	12th
Coordination with other federal and state programs	4	31	13th

Table reads: Responding to a list of 19 areas within Chapter 1, seven SEAs called coordination with the regular instructional program one of the five major problem areas in local applications.

In monitoring and technical assistance, a more pronounced difference emerges between the two types of coordination. Coordination between Chapter 1 and the regular instructional program is a high

priority in monitoring for a considerable number of SEAs (Table III-10), and a fairly large number of SEAs also sees it as an area in which school districts have a great need for technical assistance (Table III-11). In both of these realms, coordination with the regular program ranks high as a concern compared with the other topics listed on the survey. However, coordination with other federal and state programs ranks very low.

Table III-10

Program Coordination as Focus of SEA Monitoring
(n=52)

Area	Number of SEAs Calling the Area ... One of the 5 top priorities	A focus of monitoring	Rank among 19 Areas on Survey
Coordination with the regular program	23	51	2nd/3rd/4th (tie)
Coordination with other federal and state programs	4	38	16th

Table reads: Responding to a list of 19 areas within Chapter 1, 23 SEAs called coordination with the regular instructional program one of the five highest priorities in onsite monitoring.

Table III-11

Program Coordination as an Area of Local Need for Technical Assistance
(n=52)

Area	Number of SEAs Calling the Area ... One of 5 greatest local needs	An area of need	Rank among 19 Areas on Survey
Coordination with the regular program	21	48	2nd/3rd (tie)
Coordination with other federal and state programs	7	38	17th

Table reads: Responding to a list of 19 areas within Chapter 1, 21 SEAs called coordination with the regular instructional program one of the five areas of greatest local need for technical assistance.

Schoolwide Projects

Schoolwide projects, permissible in schools where at least 75 percent of the students come from families in poverty, use Chapter 1 funds throughout the school rather than targeting funds to selected students. Although schoolwide projects have been part of Chapter 1 and Title I since 1978, the Hawkins-Stafford Amendments removed one hurdle associated with setting up these projects: a previous requirement that districts must supply extra funds for schoolwide-project schools. (The formula for this matching requirement called for funds equal to the district's per-pupil Chapter 1 spending multiplied by the number of students in the school who would not ordinarily qualify for Chapter 1 services.) However, the new amendments introduced procedural and accountability requirements for schoolwide projects that can make the creation of such projects more cumbersome, including the requirement that a schoolwide project can only continue past three years if student performance in the school meets specified standards. The law also prescribes a process of planning and consultation among parents, teachers, and administrators.

The survey data confirm that participation in the schoolwide-projects option has burgeoned during 1989-90, in comparison with the previous year (Table III-12). Our respondents reported a total of 621 projects in 202 districts in 40 states. (The House survey found 664 projects in 36 states, based on information from 48 states, while our figures are based on responses from 47 states. It is possible that some states with high participation responded to the House survey and not ours, and that some with low

Table III-12

Participation in Schoolwide Projects,
1988-89 versus 1989-90, Reported by Coordinators

Unit	Number Participating	
	1988-89 (n=52)	1989-90 (n=47)
States	22	40
School districts	69	202
Schools	199	621

Table reads: In 1988-89, schools in 22 states had schoolwide projects, according to coordinators' reports.

participation responded to our survey and not that of the House.) In the 46 states where SEA coordinators could provide us with data on the number of participating schools for both years, the increase in the number of participating schools has been 203 percent. Furthermore, many new schoolwide projects can be expected to result from the fact that 196 districts are now working with their SEAs to develop applications for projects.

Just one state has fewer schoolwide projects this year than last (a decline from 13 to 11). Of the 31 states that had no schoolwide projects last year, the coordinators in 18 reported that they now have some, while nine reported that they still have none, and in four the coordinators did not indicate whether they have any. The 18 states that are new to the schoolwide-projects option this year have 137 projects among them, with a range from one to 32 projects. These figures, of course, reflect not only local attitudes towards schoolwide projects but also the number of schools that are eligible on the basis of a 75 percent poverty level. Some states have no eligible schools because they have low poverty concentrations.

The great majority of SEAs requires districts to provide detailed information about the planning process for schoolwide projects, the continuing consultation that is part of these projects, and the training provided for participants (Table III-13). However, a smaller proportion of SEAs asks for special information about needs assessment in conjunction with schoolwide projects. While 30 SEAs do ask for additional information about needs assessment when a district applies to conduct a project, 18 simply require districts to follow the regular needs-assessment procedures required for their Chapter 1 application.

Table III-13

Application Requirements for Schoolwide Projects
(n=44)

Aspect of Plan	Description	Assurance	Not Included
Process of developing the plan	40	1	3
Parent involvement in plan development	38	4	2
Training provided under the plan	37	3	4
Consultation on progress and accountability	35	6	3

Table reads: Forty SEAs require districts applying to conduct a schoolwide project to provide a description of the process of developing the plan.

Our site visits provide more information about how SEAs are approaching the option of schoolwide projects. In this group of five states, the SEAs are handling the option quite differently, reflecting different degrees of enthusiasm for it. These differences are not related to the number of eligible schools in the state.

- Within this group of SEAs, one is unique in its active promotion of schoolwide projects. In the state's largest urban district, where a majority of schools qualify for this option, the SEA coordinator says he personally gave assistance on this subject to all schools before the application deadline. The SEA disseminated information identifying different schoolwide models and appropriate instructional approaches. It also paid for reading specialists from another district to confer with their counterparts in the urban district to help generate ideas for schoolwide projects. Before the Hawkins-Stafford Amendments went into effect, the SEA provided the matching funds for ten schoolwide projects in the urban district. This year, that district has 60 schoolwide projects.

- Although the coordinator in the state just discussed considers the state's schoolwide projects quite diverse, he "makes sure" that each application contains good staff development strategies, sufficient planning time, and good evaluation systems. Secondarily, he makes sure there are specific instructional models proposed and that the principal is directly involved in all aspects of the project.

- The coordinator in another SEA regards schoolwide projects with more suspicion. Here, these projects fly in the face of a state philosophy that emphasizes the concentration of Chapter 1 resources. For example, the SEA encourages all Chapter 1 projects to focus on the primary grades, and in fact only two projects in the state serve students above the seventh grade. Because SEA staff members are very concerned about dilution of resources, they say they expect little educational benefit from the schoolwide projects that started recently.

- In a third SEA, the coordinator has a different concern: he expressed skepticism that schoolwide projects will be able to meet the law's strict accountability requirements. He agrees that this approach makes some sense for the one district that is using it, however, because the district has very high student mobility.

- A fourth SEA has neither encouraged nor discouraged the use of this option, and one schoolwide project has started this year. It was developed in conjunction with researchers from a university, who will provide help with the project's implementation.

Finally, the survey data contain some clues as to the features included in schoolwide projects, based on a question about the number of projects incorporating each of three features that the law authorized but does not mandate. Some SEAs were unable to provide any information on this question (explaining, for example, that they do not tally the characteristics of their schoolwide projects). The data suggest, however, that reducing class size is a dominant objective in schoolwide projects--exceeding even effective schools programs in popularity (Table III-14). An extended school day is a rare feature of these projects, as far as SEA Chapter 1 offices know.

Table III-14

Features Included in Schoolwide Projects, as Reported by SEA Coordinators

Feature	Number of Projects	Percent of All Projects in Responding States
Reductions in class size (n=42)	329	79
Effective schools programs (n=40)	253	62
An extended school day (n=37)	26	7

Table reads: In the 42 states where coordinators could say how many schoolwide projects include reductions in class size, 329 projects, or 79 percent, do so.

Innovation Projects

The Hawkins-Stafford Amendments introduced innovation projects to Chapter 1. Under this option, a school district may use up to 5 percent of its basic Chapter 1 grant for one or more specific purposes authorized in the law. The SEA must approve innovation projects. The purposes are diverse, covering both the extension of services to students who would otherwise not qualify (because their test scores have risen above a cut-off point or because they have moved to an ineligible school as the result of a desegregation order) and various activities for program improvement.

In general, the survey shows that innovation projects have not caught on widely during 1989-90. Respondents report a total of 97 districts nationwide, in 23 states, that are now operating innovation projects. They also report that 24 districts are working with their SEAs in developing applications for such projects. SEAs have rejected a total of 37 applications for innovation projects–34 of these in just one state.

It happens that one of the states we visited has had an unusually high degree of activity in innovation projects. The state has received 68 applications for innovation projects, reflecting the districts' response to an advisory on innovation projects from the SEA and a teleconference following up on the advisory. Within the SEA, one staff member spends about 10 percent of her time on innovation projects, and the department has had a staff inservice session on the regulations for these projects. The early applications from districts most often proposed projects for sustained student progress, teacher training, and parent involvement. Among these early applications, several had to be rejected, largely due to confusion over allowable activities for previously eligible students. (This is the state that had rejected 34 applications at the time of our survey.)

Outside that state, the story of innovation projects in the states we visited is a short one. One SEA has accepted an application for one project that will continue services to students scoring above the 50th percentile, while none of the other three SEAs has had any applications for innovation projects. Some coordinators acknowledge that they have given this option no particular publicity, saying that they place a higher priority on activities that serve students directly. The survey data corroborate that many SEAs have given innovation projects a low profile: only 13 SEAs have issued rules or policies in this area, while 38 reported that they have done neither (the highest figure for any area of program administration), and two did not respond to the question.

Summary

The new legal provisions discussed in this chapter reflect different approaches to improving the Chapter 1 program. Establishing committees of practitioners at the state level and requiring parent involvement in local decisionmaking have the aim of making the program more responsive to its constituencies. Requiring parent involvement in the educational program and coordination of Chapter 1 with other services, as well as permitting schoolwide and innovation projects, all reflect ideas about what can make local Chapter 1 programs more educationally effective. The SEAs' early response to these provisions gives some indication of the priorities that they are choosing within each new area of the law.

Committees of Practitioners

- Almost all SEAs have created a new committee to serve as the committee of practitioners. To find committee members, they have consulted diverse individuals and (less commonly) organizations. They have consulted most widely with local administrators; the organizations most often consulted have been those representing private schools and local boards of education.

- On average, a committee of practitioners has about 18 members. The largest single group of members nationwide is made up of local Chapter 1 coordinators (24 percent of all members). Teachers and parents each constitute 17 percent of members.

- Forty-one committees have been extensively involved in commenting on initial drafts of state program improvement plans, according to coordinators. Committees have commented extensively on initial drafts of rules, regulations, or policies in 23 states.

Parent Involvement

- SEAs have increasingly asked districts for a narrative description of their plans in parent involvement as a part of the Chapter 1 application. Parent involvement has been a prominent focus of application review, onsite monitoring, and technical assistance by SEAs.

- Most often, SEA assistance with parent involvement includes the dissemination of materials developed outside the SEA (in 41 states).

- The type of parent involvement strongly promoted by the largest number of SEAs (46) is informing parents about their child's school performance. Half or more of SEAs also report strong promotion of parent involvement in Chapter 1 decisionmaking groups, training parents to help with homework, and training teachers about parents' educational role.

- Among the activities that SEAs know districts are carrying out, Chapter 1 parent-teacher conferences rank first (70 percent of districts). Dissemination of home-based education activities is taking place in 37 percent of districts, reflecting a 60 percent increase since last school year.

Coordination with Other Instruction

- Coordination between Chapter 1 and the regular school program is reportedly a focus of monitoring in 51 states and an area of need for technical assistance in 48. Coordination with other federal and state programs is much less prominent as a focus for monitoring or assistance.

Schoolwide Projects

- According to SEA reports, schoolwide projects are operating in 621 schools in 1989-90; this is more than a three-fold increase since the previous year. The number of states participating in this option has risen from 22 to 40, although our site visits indicate considerable variation in the enthusiasm SEAs are showing for schoolwide projects.

- As far as SEA coordinators know, reductions in class size have been a dominant focus of schoolwide projects--found in 79 percent of such projects. Effective schools programs are found in 62 percent of the projects.

Innovation Projects

- SEAs report a total of 97 districts conducting innovation projects in 1989-90. Judging by our site visits and the low rate of rulemaking on innovation projects, quite a few SEAs have probably given this option little or no publicity.

IV. SEAs' Administrative Responsibilities

While the new provisions in the Hawkins-Stafford Amendments have been of concern to SEAs, the major concerns of SEA Chapter 1 offices remain what they have been for years--carrying out the routine functions of application review, monitoring, and assistance to districts. Across the board, coordinators estimate that they and their staff members spend 23 percent of their time in application review and 33 percent in monitoring (of the total time devoted to the basic grants program). Trends in these areas, then, tell an important story about program administration. This chapter discusses, in turn, SEA staffing, state rulemaking, application review, monitoring, and funds allocation.

Staffing and Funding for SEA Chapter 1 Offices

The great bulk of SEA program administration funding, 77 percent, goes into staff salaries and benefits. Across the board, SEAs house 616 full-time-equivalent (FTE) staff members working on Chapter 1 matters (Table IV-1). This number is virtually unchanged since 1985-86. The largest staff category in SEA Chapter 1 offices is that of "generalists," who include the 67 FTE directors and deputy directors and 185 FTEs who take general responsibility for oversight of a group of districts within the state (often in a geographical region). There have been shifts in the responsibilities of SEA staff members, however, with 21 percent fewer falling in the generalist category now than in 1985-86. A category that has grown by 25 percent since 1985-86 is that of specialists. In particular, there has been growth in the number of subject specialists, such as reading experts. Specialists in parent involvement, while still few in number, are on the upswing since the mid-1980s.

The magnitude of the shift away from generalists and toward specialists should not be overstated; after all, generalists still outnumber specialists by two to one, and they outnumber subject specialists by five to one. Still, the trend is an interesting continuation of one observed during the research for the National Assessment of Chapter 1 in 1985-86. At that time, SEA Chapter 1 administration was very much dominated by generalists. Farrar and Millsap (1986)[1] pointed out that newer staff members in SEAs tended to have stronger backgrounds in curriculum and instruction than their veteran colleagues, but that these newer staff members were still being trained for positions as generalists rather than having many formal opportunities to use their educational skills in working with districts. Data from the current survey suggest that this situation is changing to some extent, and that at least some SEAs have put their subject specialists into specialist positions.

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[1] Farrar, E., & Millsap, M. A. (1986, December). State and local administration of the Chapter 1 program, Vol. I. Cambridge, MA: Abt Associates, Inc.

Table IV-1

Changes in Number of SEA Staff
Under Title I and Chapter 1

Functions	Number of Positions in Full-Time Equivalents (FTEs)			Percent Change 1985-86 to 1989-90
	Title I 1981-82 (n=49)	Chapter 1 1985-86 (n=49)	Chapter 1 1989-90 (n=52)	
Generalist*	466	330	262	-21
Specialist	157	113	141	+25
Subject specialist	32	26	50	+92
Parent specialist	10	3	8	+167
Evaluation specialist	32	27	27	0
Audit/Fiscal specialist	83	57	56	-2
Other**	46	21	29	+38
Secretarial/Support	212	141	184	+30
Total	881	605	616	+2

Source for 1981-82 and 1985-86: State Survey conducted for the Chapter 1 National Assessment, 1985-86.

* These are staff who have general oversight responsibilities for Chapter 1 operations in particular school districts. This number includes the state Chapter 1 director.

** Examples include information writer, office manager, administrative assistant, and attorney.

Table reads: Nationally, state officials reported 466 FTE staff performing generalist functions during 1981-82, 330 FTE staff performing these functions in 1985-86, and 262 FTE staff performing these functions in 1989-90. This represents a 21 percent decline since 1985-86 in the number of FTE staff performing these functions.

Although shifts in emphasis are apparent from these staffing trends, most state Chapter 1 directors themselves represent a force for stability. They average just under seven years in their current positions and 15 years with the Title I/Chapter 1 program. These figures are comparable to those obtained in the 1986 survey, when directors averaged just over seven years on the job and 13 years with the program.

The next few years may see continued change in SEA priorities and staffing. There is a sizable cohort of new directors--11 who have been director for one year or less. These people have not yet had an opportunity to put their own imprint on the program, but they can be expected to do so.

Before the Hawkins-Stafford Amendments went into effect, SEAs could charge an indirect-cost rate higher than 15 percent on the set-aside for state administration. Fifteen SEAs did so; of these, six charged rates falling between 15.1 and 20 percent; four charged rates between 20.1 and 25 percent; and five charged rates higher than 25 percent. Among these 15 SEAs, just three coordinators reported that the new limit poses problems. The others reported that the new law has altered the rate charged by the SEA but that this has not posed problems.

State Rulemaking

Not all SEAs issue rules or policies concerning Chapter 1; 36 said they have done so since September 1988, while 17 said they have not. Among those SEAs that have issued rules or policies during this time, the new Hawkins-Stafford provisions have been a major focus, but not the sole focus (Table IV-2). The new provisions related to identifying and working with schools in need of improvement have been the subject of the largest number of new rules, but attendance area eligibility and targeting--a program area not substantially altered by the amendments--is close behind. In state policies, the provisions on schools in need of improvement are again the most widespread areas of focus, with comparability and the identification of students not making gains as the next most common areas. In general, the variation is modest; most areas on this list have been the subject of rules in about 10 percent of states and the subject of policies in about one-fourth to one-third of states.

Application Development and Review

Content of the Application

In several areas, the federal law and regulations specify that local applications must contain an assurance but not necessarily a narrative description. We asked SEAs whether they were requiring descriptions in each of these areas, and the results appear in Table IV-3. The table shows that SEAs are selective about the areas in which they require descriptions, but that the trend across the board is to require more. Program coordination is an area with a particularly noticeable increase in the frequency of required descriptions. A comparison with data collected in 1985-86 for the National Assessment of Chapter 1 shows divergent trends in two areas of the application: in parent involvement the number of states requiring a description has risen from 37 to 44, while in comparability the number has fallen from 34 to 18.

Table IV-2

Number of SEAs Issuing Rules or Policies in Particular Areas
Between September 1988 and January 1990*

Area	Issued Rule	Issued Policy	Issued Neither
Identification of schools in need of improvement	9	28	18
Plans to work with schools in need of improvement	9	28	18
Other evaluation issues	7	18	28
Attendance area targeting	7	14	32
Identification of students not making gains	6	21	28
Parent involvement	6	17	30
Student selection	6	16	31
Schoolwide projects	6	12	35
Innovation projects	6	7	38
Comparability	5	21	27
Budget	5	15	32
Coordination with other federal and state programs	5	13	35
Program design	5	12	35
Coordination with regular instruction	5	12	36
Supplement not supplant	4	13	36
Maintenance of effort	4	11	37
Size, scope, and quality	4	11	37
Needs assessment	3	13	34
Private-school students	2	17	33

* Some rows total more than 53 because SEAs issued both rules and policies; some total less than 53 because of missing data.

Table reads: Nine SEAs issued rules concerning the identification of schools in need of improvement.

Table IV-3

Number of SEAs Requiring Narrative Descriptions in Local Applications, by Area

Area	In 1988-89	In 1989-90
Services to private-school students	46	47
Parent involvement	40	44
Coordination with regular instruction	25	35
Size, scope, and quality provisions	33	35
Supplement, not supplant	23	22
Coordination with other federal and state programs	11	19
Comparability	15	18

Table reads: In 1988-89, 46 SEAs required districts' applications to describe the services planned for private-school students.

Communication During the Application Process

Contact between SEAs and districts is frequent while local coordinators are figuring out how to complete their applications and while SEA staff members are reviewing the applications. Our site visits showed that the application process begins in the spring, when SEA staff members introduce any changes in the application package at statewide or regional workshops (or both) for local coordinators. In the states we visited, these workshops are an important part of program administration, since they introduce local administrators in a very concrete way to the requirements they will need to fulfill. Interaction between the SEA and the districts continues throughout the processes of application preparation and review. Part of the job of an SEA Chapter 1 employee is checking local applications for accuracy in arithmetic. SEA staff members also review applications for their adherence to the law, often finding errors or misunderstandings.

The survey findings show that 55 percent of Chapter 1 districts contacted their SEAs with questions about the 1989-90 application, in the 51 states providing data on this subject. Nine SEAs reported that every district contacted them with questions, and 30 SEAs said that more than half of their districts did so. Even more frequently, SEA staff members contacted districts about problems in their applications: 61 percent of districts in the 52 responding states received such contacts from their SEAs.

Ten SEAs reported that they contacted all their districts, and 31 said they contacted more than half of their districts. On average, among those districts that needed to be contacted at all, SEAs contacted them twice before finally approving their applications.

These data do not mean that local applications are rife with potential violations of the law, however. Nationwide, among the 50 states providing data on this point, 18 percent of all Chapter 1 districts were contacted due to relatively serious problems. In most cases, the problems occurring on the applications have been relatively simple matters, such as arithmetic errors. Table IV-4 shows that few states reported a high proportion of "relatively serious" problems on local applications.

Table IV-4

Percent of Application Problems That Are Serious, by State
(n=52)

Percent of Problems Called "Relatively Serious"	Number of SEAs
0-10	14
11-20	11
21-30	7
31-40	6
41-50	2
51-60	4
61-70	2
71-80	4
81-90	1
91-100	1

Table reads: In 14 SEAs, between zero and 10 percent of the application problems that prompt the SEA to contact the district are termed "relatively serious."

Combining these findings with the survey responses concerning the parts of the application that most often pose problems (Table IV-5), we can infer that arithmetic errors in computing a budget are a very typical reason for SEAs to contact districts before approving their applications. Program design ranks next as a common problem. Parent involvement and evaluation pose problems for at least some

Table IV-5

Number of SEAs Finding Problems in Applications, by Area
(n=51)

Area	SEAs Finding Problems	SEAs Ranking Among 5 Major Problem Areas
Budget	51	47
Program design	48	30
Attendance area targeting	45	27
Parent involvement	44	22
Evaluation issues	44	19
Private-school student participation	44	14
Student selection	41	28
Needs assessment	41	19
Size, scope, and quality	38	11
Schoolwide projects	35	8
Comparability	35	5
Coordination with regular instruction	32	7
Coordination with other federal and state programs	31	4
Maintenance of effort	30	4
Supplement, not supplant	28	10
Identification of schools in need of improvement	22	7
Identification of students not making gains	19	6
Plans to work with schools in need of improvement	19	5
Innovation projects	19	2

Table reads: In 1989-90, 51 SEAs found problems in the budget area in at least some local applications; 47 SEAs termed the budget one of the five most frequent problem areas.

districts in the largest number of states, but SEAs are more likely to find widespread problems in the selection of students and attendance areas for services. As discussed in the second chapter of this report, the new provisions for school and student improvement did not cause widespread problems in 1989-90, presumably because many SEAs did not include these subjects on the regular application.

Who Reviews Local Applications

In our site visits, we found that application review may take place in various parts of the SEA, and that these varying arrangements correspond to variation in the application's content:

- Most notably, one of the SEAs requires districts to submit a consolidated application covering many different categorical programs, and the entire process of application review is centered outside the Chapter 1 office. Chapter 1 staff members do, however, review the portion of the consolidated application that deals with Chapter 1.

- A second SEA is at the opposite end of the spectrum, having self-contained Chapter 1 applications that a self-contained Chapter 1 office reviews.

- A third SEA is moving toward a consolidated approach. There, the Chapter 1 coordinator also coordinates activities under Chapter 2 and Title II of ESEA, and districts will submit a single application for funding under all three programs next year. (Chapter 2, formerly part of the Education Consolidation and Improvement Act, is the Federal, State, and Local Partnership for Educational Improvement. Title II, formerly part of the Education for Economic Security Act, is the Dwight D. Eisenhower Mathematics and Science Education Act.)

- A fourth SEA has yet a different approach, with the responsibility for application review shared between the Chapter 1 office and another part of the SEA, the Basic Skills Division, where specialists in reading, mathematics, and early childhood education review and criticize the educational approaches that districts propose. This division has the authority to compel a district to change its program design. The Chapter 1 staff members are considered "the specialists in rules and regulations," according to the coordinator, while the Basic Skills Division attends to instructional matters.

- The fifth SEA's process also includes a review by instructional specialists outside the Chapter 1 office, but these specialists only make suggestions, which the Chapter 1 staff may or may not pass along to the districts.

In these states, the Hawkins-Stafford Amendments prompted few or no changes in well-established, routine application procedures, although details of the application forms themselves did change in response to the amendments.

Frequency and Intensity of Monitoring

How often a district receives a monitoring visit and how long the monitors spend onsite depend heavily on what state the district is in. SEAs' staff resources for monitoring vary, as do their decisions about how to deploy these resources. In our site visits, we found that different principles govern the decisions about how often to monitor districts onsite, including the size of the district's Chapter 1 allocation, the amount of help the SEA staff believes the district needs, and the preferences of the SEA staff members who cover particular regions within a state. Nevertheless, in an attempt to gather uniform nationwide data, we asked SEAs to divide their districts into five categories by total enrollment and to indicate how often they typically conduct onsite monitoring for the districts in each category. As Table IV-6 shows, there is wide variation in the frequency of monitoring within each enrollment category. An annual monitoring cycle is most common--but not universal--for large and very large districts, and a sizable group of SEAs monitors the medium-sized districts every year as well. A three-year cycle is the norm in at least one-fourth of states for districts of every size category except very large. Relatively few SEAs monitor districts of any size less often than every three years.

Table IV-6

Frequency of Onsite Monitoring, by Number of SEAs

District Enrollment	Annual	Every 2 Years	Every 3 Years	Every 4+ Years
Very large (25,000+) (n=39)	24	5	8	2
Large (10,000-24,999) (n=48)	23	8	14	3
Medium-sized (2,500-9,999) (n=51)	13	13	20	5
Small (600-2,499) (n=48)	3	19	22	4
Very small (< 600) (n=45)	2	12	25	6

Table reads: Among the 39 responding SEAs that have very large districts, 24 typically conduct onsite monitoring of such districts annually.

State-to-state variation is also evident in the number of person days devoted to a typical monitoring visit (Table IV-7). For example, among the 35 SEAs reporting on the typical number of

person days spent on a visit to a very large district, the mean number of person days reported is 14.9, but 10 respondents gave a number between two and 10, and 11 gave a number greater than 20. Three SEAs reported that more than 50 person days are spent in a monitoring visit to a district in this size category. This wide variation reflects different SEA policies on monitoring, as well as the special situations of the nation's largest districts, which are likely to require far more monitoring resources than districts of just over 25,000 enrollment. At the other end of the spectrum, 36 of the 45 responding SEAs with very small districts report spending one person day on monitoring visits to such districts, but four SEAs report spending four or more person days when visiting them.

Table IV-7

Mean Number of Person Days SEAs Devote to Each Monitoring Visit to Districts of Particular Sizes

District Enrollment	Mean Person Days
Very large (25,000+) (n=35)	14.9
Large (10,000-24,999) (n=47)	10.9
Medium-sized (2,500-9,999) (n=48)	4.3
Small (600-2,499) (n=49)	2.2
Very small (< 600) (n=46)	1.5

Table reads: Among the SEAs reporting on the person days they devote to monitoring visits to very large districts, the mean number of person days spent on such visits is 14.9.

Onsite visits are not the SEAs' only ways of monitoring districts. Thirty-two SEAs reported using other means of monitoring, primarily desk reviews and telephone conversations--used by 28 and 24 of these SEAs, respectively. Eleven of these 32 SEAs reported monitoring all their districts through means other than site visits, but more often these other means are used for districts that are not scheduled for visits during the year (17 SEAs), or districts that have had problems in previous years but are not scheduled for visits (15 SEAs).

Who Conducts Monitoring Visits

While monitoring occupies a high proportion of the staff time in SEA Chapter 1 offices--an average of 33 percent nationwide--quite a few states deploy other people besides SEA Chapter 1 staff members as monitors. Our site visits illustrate some of the different staffing patterns for monitoring:

- One SEA monitors Chapter 1 in conjunction with seven other federal and state categorical programs. A separate office in the SEA coordinates this monitoring, which involves SEA staff members representing the categorical programs as well as "field colleagues," who are generally local administrators.

- A second SEA has a procedure that is similar in two respects. First, Chapter 1 is reviewed along with other programs--in this case, Chapter 2 and Title II of ESEA. (The monitors use a separate checklist for each program, however.) Second, local staff members participate in monitoring. In fact, many districts receive two-day visits conducted exclusively by educators from other districts, whom the SEA has trained. SEA staff members sometimes participate in the exit conferences; they visit districts where they know of a problem or foresee one; and they monitor the state's five largest districts.

- A third SEA Chapter 1 office shares some of the monitoring responsibility with the Basic Skills Division. That division sends eight to ten people into a typical district every three years and looks at the Chapter 1 instructional program as part of its work. During that year, the SEA Chapter 1 office confines its monitoring in that district to other matters (e.g., school and student selection). In the years when the Basic Skills Division does not visit a district, the Chapter 1 office monitors all aspects of the program, including educational ones.

- The other two Chapter 1 offices handle monitoring themselves.

These SEAs have organized their monitoring in accordance with state philosophies about Chapter 1. In the first state discussed above, for example, state policy emphasizes the importance of a uniform, challenging core curriculum for all students, including participants in categorical programs. A consolidated approach to monitoring is one means of promoting service integration. In the second state, the coordinator sees important similarities among the three programs under his jurisdiction--Chapter 1, Chapter 2, and Title II. He comments that the programs deal with "basically the same kids in the same school, and in this way we can work to integrate services not just on paper but in practice."

According to our survey responses, 19 SEAs include local administrators on monitoring teams. Fifteen include SEA staff members who are not part of the Chapter 1 office.

Monitoring Priorities

In reporting what areas of Chapter 1 practice they monitor onsite, SEAs demonstrated a desire to cover the program comprehensively (Table IV-8). At least two-thirds of them reported that they examine all but three of the areas mentioned in the survey; the exceptions are schoolwide projects, maintenance of effort, and innovation projects. When asked to indicate their highest priorities in monitoring, SEAs tended to converge in naming student selection. Other areas often mentioned as high priorities were, in order of frequency, parent involvement, supplement not supplant, program design, and coordination between Chapter 1 and the regular program.

Table IV-3

Number of SEAs Monitoring Particular Program Areas
(n=52)

Area	SEAs Monitoring	SEAs Ranking Among 5 Highest Priority Areas
Student selection	52	41
Parent involvement	51	35
Supplement, not supplant	51	31
Coordination with regular instruction	51	23
Program design	49	24
Attendance area targeting	49	13
Private-school student participation	49	11
Comparability	48	8
Budget	47	13
Size, scope, and quality	46	15
Identification of students not making gains	44	5
Evaluation issues	43	6
Identification of schools in need of improvement	41	11
Needs assessment	41	4
Plans to work with schools in need of improvement	40	11
Coordination with other federal and state programs	38	4
Schoolwide projects	33	2
Maintenance of effort	24	2
Innovation projects	22	0

Table reads: In 1989-90, all 52 responding SEAs monitored student eligibility and selection onsite; 41 SEAs termed this one of their five highest priorities in monitoring.

Funds Allocation

Among the routine responsibilities of SEA Chapter 1 offices is the allocation and reallocation of funds to districts in the state. The Hawkins-Stafford Amendments introduced a few new procedures in this area, having to do with the procedures for allocating concentration grants (to districts with high percentages or large numbers of children living in poverty) and the amount of their grants that districts can carry over to the following year. Our survey investigated SEA procedures in response to these changes.

Concentration grants go to a total of 5,874 districts in the responding states. In most states, the procedure for distributing these grants involves a determination of county eligibility, followed by district eligibility; in the five SEAs receiving the minimum concentration grant, districts are eligible if their number or percentage of formula-eligible children exceeds the state average. Eleven SEAs use the option of reserving concentration grant funds for payments to eligible districts in otherwise ineligible counties. A nationwide total of 269 districts receives concentration funds as a result of this option. Once a district receives its concentration grant, it typically commingles it with the Chapter 1 basic grant; just two SEAs require a separate accounting for concentration funds.

In response to the new limit on carryover of 25 percent, half of the SEAs have changed their policies on carryover. Asked to estimate how many districts would carry over more than 25 percent of their funds if the law allowed it, the SEAs gave estimates adding up to 9 percent of the districts that receive Chapter 1 funds.

Perceived Necessity and Burden of Requirements

Borrowing a question that has been asked at the district level in 1981-82 and 1985-86, we asked the SEA coordinators to judge which of 11 different categories of requirements are, first, the most necessary for attaining the objectives of Chapter 1 and, second, the most burdensome. Their responses show a general perception that the law's targeting provisions rank highest in necessity, while the new requirements for program improvement are seen as burdensome and not very necessary (Table IV-9). However, looking more closely at the ratings of the necessity of the new provisions for program improvement, the responses turn out to be quite diverse. Eight coordinators rated these provisions first or second in necessity, despite the low average ranking.

Table IV-9

Overall Rankings of Chapter 1 Requirements by Perceived Necessity and Burden*

Category of Requirements	Rank on Necessity	Rank on Burden
Ranking and selecting students	1	5
Needs-assessment procedures	2	3
Ranking and selecting project areas	3	8
Supplement, not supplant provisions	4	9
Evaluation procedures	5	2
Size, scope, and quality provisions	6	11
Parent involvement	7	6
New provisions for program improvement	8	1
Private-school student participation	9	7
Comparability procedures	10	4
Maintenance of effort provisions	11	10

* Based on an average of all respondents' ratings.

Table reads: Responding to a list of 11 categories of requirements, SEA coordinators ranked the ranking and selection of students first in necessity for attaining the objectives of the Chapter 1 program, and fifth in degree of burden.

Summary

This chapter has described SEAs' procedures and priorities in carrying out their regular administrative functions of rulemaking, application review, monitoring, and funds allocation. It places the new provisions of the Hawkins-Stafford Amendments in the perspective of all the other program provisions that SEAs deal with in carrying out these functions. The major findings, by area of administrative practice, are as follows:

Staffing

- Most of the administrative set-aside allocated to SEAs goes into staff salaries.
- Specialists, particularly subject specialists, are to some extent replacing generalists on SEA staffs, although generalists remain a larger staff category across the board.
- As was true in 1985-86, most state Chapter 1 directors have occupied their current positions for about seven years and have been with the program for about twice that long. Thus, directors represent a force for stability in the program--although the presence of a large cohort of 11 new directors suggests that changes may be in the offing.
- The limit of 15 percent on indirect costs charged by SEAs has affected 16 SEAs that previously charged a higher indirect rate; the change has posed problems in three of these.

State Rulemaking

- While almost one-third of SEAs (17) have made no new rules or policies since September 1988, the major areas of focus among those who have are the identification of schools in need of improvement and plans to work with schools in need of improvement. Aside from these areas, there is only modest variation across areas of Chapter 1 requirements in the number of SEAs issuing either rules or policies.

Application Development and Review

- Between 1988-89 and 1989-90, there has been an increase in the number of SEAs requiring narrative descriptions in several areas of the application, most notably in coordination between Chapter 1 and regular instruction (where the number has risen from 25 to 35) and between Chapter 1 and other special programs (11 to 19).
- Most districts (55 percent) contact their SEAs with questions while preparing their applications, and SEAs in turn contact most districts (61 percent) due to problems appearing on the applications. However, the majority of these problems are relatively minor (e.g., arithmetic errors).
- Problems in local budgets dominate the conversation between SEAs and districts concerning applications; 47 SEAs call this one of the five areas most frequently causing them to contact districts. Other areas said to cause frequent problems are program design (for 30 SEAs), student selection (28), attendance area targeting (27), and parent involvement (22).
- Some SEAs, acting on a philosophy that emphasizes program coordination, ask districts to submit consolidated applications covering more than one program.

Monitoring

- The frequency and intensity of onsite monitoring varies tremendously across states for districts of the same general enrollment size. The largest number of SEAs monitors districts enrolling 10,000 or more students annually and monitors smaller districts every three years.
- Most SEAs (32) use other means of monitoring in addition to site visits, especially desk reviews and telephone conversations.

- Among the people conducting monitoring visits in 19 states are local administrators; in 15 states, SEA staff members from outside the Chapter 1 office participate in monitoring.

- Monitoring visits in almost all SEAs are comprehensive, including scrutiny of virtually every program feature. When asked to identify their five highest priorities for monitoring, most SEAs chose student selection (41 SEAs); parent involvement (35); supplement, not supplant (31); program design (24); and coordination with regular instruction (23).

Funds Allocation

- SEAs are allocating concentration grants to 5,874 districts in 1989-90, including 269 eligible districts located in otherwise ineligible counties. SEAs rarely ask districts to account separately for their spending of concentration grants.

- SEAs estimate that, without the new limit on local carryover of funds, about 9 percent of all participating districts would carry over more than 25 percent of their grants.

Necessity and Burden of Requirements

- Asked for their opinions on the necessity and burden of each of 11 categories of Chapter 1 requirements, SEA coordinators ranked the law's provisions for ranking and selecting students highest in necessity; they ranked the new provisions for program improvement highest in burden.

V. Conclusions

The SEA Chapter 1 offices have not rushed into implementing the new provisions of the Hawkins-Stafford Amendments. They have, in general, taken a cautious stance in administering the law's most innovative provisions--those dealing with program improvement. Most SEAs have not required a standard higher than zero NCEs in the identification of schools in need of improvement; most have been slow to disburse their grants for program improvement. Their early responses to new provisions in other parts of the law, while diverse, also display less than headlong enthusiasm.

There are many reasons to expect this type of response from the SEAs. First of all, there is no real reason for them to see themselves in a position to launch major initiatives. Their overall staff size and composition is little changed over the past five years. If the coordinators wanted to take program administration in new directions, many of the generalists who dominate their staffs would be ill-equipped to follow.

Second, most coordinators are veterans in their positions and with the program, and they tend to adhere to the Title I and Chapter 1 procedures that they have overseen for years. In answering our question about the necessity and burden associated with 11 specific categories of requirements, many coordinators clearly took the opportunity to send a message of skepticism or hostility towards the new provisions for program improvement: 14 rated these provisions ninth, tenth, or eleventh in necessity; while 17 rated them first in burdensomeness. By contrast, it was the law's tried and true procedures for student selection, needs assessment, and attendance-area targeting that ranked first, second, and third in the coordinators' overall necessity ratings.

Traditionally, most of the staff effort in SEA Chapter 1 offices goes into application review and monitoring. It is interesting to note this study's finding that most of the problems identified in application review are relatively minor ones such as arithmetic errors in computing a budget. State coordinators estimate that only about 18 percent of Chapter 1 applications contain more serious problems. This might suggest that SEAs could reduce the time they spend in application review--although the counterargument would be that even minor errors need to be caught and corrected in order to ensure a fully accountable program. Similarly, the SEAs' comprehensive approach to monitoring also gives rise to the thought that spot-checking might be as effective a deterrent to wrongdoing, while achieving efficiencies and thus freeing up more administrative energy for the instructional program. Again, though, the counterargument is that SEAs have a responsibility to prevent or find any malfeasance in the program, and that if they ease up on this responsibility the program will run the risk of politically costly scandals.

Besides these general factors having to do with the staffing, leadership, and priorities of Chapter 1 offices, circumstances associated with the new provisions for program improvement have also had the

effect of fostering caution. Many administrators in the Chapter 1 system have naturally placed a high priority on making the process of school identification and improvement manageable. In interviews, some state officials mentioned to us that they were concerned about having enough resources for the improvement process; accordingly, they did not want to see huge numbers of schools enter that process in the first year. When the regulations specifically cited a standard of zero NCEs--albeit with the statement that a higher NCE standard would be preferable--and when the TACs circulated among SEAs the early state program improvement plans that adopted the zero-NCE standard, it was clear that such a standard would be acceptable.

Ironically, one of the Hawkins-Stafford reforms may well have worked to reduce the stringency of standards for identifying schools in need of improvement. While we do not know what the committees of practitioners said in most states, our findings contain some hints that many of these committees have advised setting low standards and identifying small numbers of schools. In two of the states we visited, coordinators told us that the committees had succeeded in persuading the SEA staff to set lower standards. The survey findings show that the committees actively reviewed draft program improvement plans in most states. And, although some of the local Chapter 1 coordinators and other local administrators (e.g., superintendents) who dominate the committees' membership are surely enthusiastic about the prospect of program improvement, in general they are a group that is likely to feel threatened by this prospect. Forceful advocates for rocking the Chapter 1 boat are likely to have been in the minority on most committees, judging by the groups that committee members have tended to represent. Thus, it seems reasonable to guess that the gist of most of the committees' advice on program improvement was to go slow.

The law's new provisions in another area, that of parent involvement, have had only modest effects on SEA and local practices. With only eight FTE staff members characterized as specialists in parent involvement, the SEAs have a very limited capacity to spearhead the implementation of these provisions. They have provided assistance to local districts in parent involvement, but the assistance providers from the SEAs have overwhelmingly been Chapter 1 generalists, and they have most often relied on disseminating materials developed elsewhere. If one overall message about parent involvement comes through from the SEA Chapter 1 offices, it is that parent conferences are an important means of involvement. Beyond this message, the priorities promoted by SEAs are very diverse, and the limited staff expertise in most SEAs probably makes the overall effect rather diffuse. Respondents to our survey have noticed a surge in the local dissemination of home-based educational materials, but this seems to result from broader trends in the education profession, since it is not a type of parent involvement most actively promoted by SEA Chapter 1 offices.

Schoolwide projects represent a nontraditional use of Chapter 1 funds that has grown in popularity since the Hawkins-Stafford Amendments took effect. This state-level survey was not a good vehicle for learning much about the nature of schoolwide projects, but one finding stands out:

overwhelmingly, the projects with which SEA coordinators are familiar have used the schoolwide option as a way of reducing class size.

On the basis of our findings, some issues stand out as deserving further attention as the implementation of the Hawkins-Stafford Amendments continues to unfold:

- Will SEAs and school districts set tougher standards for identifying schools in need of improvement as they gain experience with this part of the law? Or will they maintain the standards they are using now, since the same standards will probably yield a larger crop of schools in need of improvement when applied to 1989-90 data (with the measurement of more advanced skills and a 12-month period between tests), and since each year will bring a new cohort of schools into an improvement system whose overall resources may be seen as modest?

- What sources of ideas are becoming available to the schools in need of improvement? We know that the SEAs, the TACs, and the R-TACs are dominating the first wave of technical assistance for these schools. We also think it is possible, although not certain, that 10- or 15-year-old research ideas about effective instruction are a major intellectual influence on the process so far.

- What are the local trends in activities for parent involvement, and what are the sources of ideas behind these trends?

- What is the local understanding of the increased requirements for coordination between Chapter 1 and the regular program, and between Chapter 1 and other federal and state programs? We know that SEAs have stepped up their attention to coordination, but we do not know what local decisionmakers think they should do in order to comply with these requirements.

- What do schoolwide projects look like? If reductions in class size are a dominant objective, as SEA coordinators reported, how big are the reductions? Do they affect all students equally, or are they targeted in some way? (For example, does a typical schoolwide project reduce class size in an elementary school from 28 to 25 across the board? And what is the educational significance of such a reduction?)